

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

JUDITH ALAYON; ANGEL CLAVEROL  
RODRIGUEZ; TERESITA DIAZ SOTO; CLAUDIA  
MARTINEZ ROJA; ANA SANTOS MARTINEZ;  
FRANK BAYRON VIGO; FRANK CARLOS  
BAYRON RODRIGUEZ; GLADYS RODRIGUEZ  
RAMOS; FRANK J. BAYRON RODRIGUEZ;  
ELADIO PEREZ PEREZ; MARGARITA  
SANCHEZ; DAVID RIVERA OLIVERA SALTALIZ;  
ELLIOT MARRERO ORTEGA; DAVID RIVERA  
SANTIAGO; GRISELLE BLONDET LABOY;  
DAVID A. RIVERA BLONDET; DARISEL RIVERA  
BLONDET; JOSE L. RIVERA RODRIGUEZ; IRIS  
M. CARABALLO AYUSO; JOSE L. RIVERA  
CARABALLO; NATALIA N. RIVERA CARABALLO;  
OMAR WARNER PATTON; ANGEL L. MORALES;  
JOSE G. MALDONADO; NORA N. GOMEZ  
MOLINA; CAMILLE A. MALDONADO GOMEZ;  
JOSE LOPEZ GUZMAN; NORMAN LOPEZ  
GUZMAN; NORMA GUZMAN SANTOS ;  
ROBERTO VALDES MORALES; JUAN CARLOS  
CORDOVA DAVILA; ROSA I. TORRES  
MARTINEZ; JOHN CARLO CORDOVA TORRES;  
LUIS N. PUIG TORRES; CURCITA MARTINEZ  
BIERA; ANGEL ROBLES TORRES; LARA  
LUCIANO LAMOURT; MARIA M. OSORIA  
ROBLES; ELIZABETH PADILLA ORTIZ;  
FRANCIACO MARRERO COLON; ZULEIKA  
MIRANDA JIMENEZ; FRANCISCO VELEZ  
ARROYO; MARLENES ZULAY VELEZ MIRANDA;  
CRISTIAN M. IGLESIAS MIRANDA; JHUSTHINO  
JULIER MIRANDA; JORGE LUIS GALINDO  
FIGUEROA; AYMARA GALINDO; JORGE LUIS  
GALINDO RAMIREZ; JOMAR LUIS GALINDO  
RAMIREZ; RAMONA RIVERA TORRES;  
ROBERTO MATOS; YESENIA MARTINEZ  
COSME; JUAN E. NEGRON RIOS; FELIX  
RICARDO ANDRES RODRIGUEZ MARTINEZ;  
MARIA E. LOPEZ ORTIZ; MIGUEL A. ARCE  
LOPEZ; EMILY ARCE LOPEZ; MIGUEL ANGEL  
ARCE NEGRON; ANABELIS COLLAZO QUILES;  
SULIYMAR ROSARIO COLLAZO; RICHARD  
ROSARIO COLLAZO; XAVIER OMAR ROSARIO  
COLLAZO; MARIA RIVERA GARAY; LIZZY  
MARIE PAGAN RIVERA; ADAN PEREZ  
BARRETO; ASTRID QUIÑINEZ GONZALEZ;  
ABNER QUIÑONES GONZALEZ; BRENDA LIZ  
GONZALEZ ROMAN; PEDRO PEREZ; LUZ E.  
ROSARIO HERNANDEZ; JOSE ALBERTO  
QUILES COLON; BENJAMIN CARABALLO;  
LYLLIAN RODRIGUEZ CARABELLO; JOAN  
MARIE CASTELLANO RODRIGUEZ; IRIS  
RIVERA; PEDRO J. CASTELLANO RODRIGUEZ;  
JESUS MANUEL ROSARIO MOLINA; LUZ E.  
POLANCO PABON; JUANA LOPEZ SANTANA;  
JEANITZA SAINZ LOPEZ; JEIMILITZA SAINZ

Civil No. 11-1206

PLAINTIFFS DEMAND  
TRIAL BY JURY

LOPEZ; JULITZA SAINZ LOPEZ; HECTOR  
 LEBRON RAMOS; CALROS L. RIEVAR  
 MONTAÑEZ; SAMUEL RIVERA MONTAÑEZ;  
 DIANA REYES BAEZ; MARCELINO RODRIGUEZ  
 GONZALEZ; DIJEAN ESCOBAR RIVERA; JERRY  
 JUARBE ROBLES; MARISELIS MUÑIZ; JOHN W.  
 JENKINSON; CATHERINE KALANTAR;  
 MILAGROS CASTRO SANCHEZ; JOSE R.  
 REYES ORTIZ; JOSE REYES CASTRO; ERIKA  
 ROMAN RIVERA; NIWDEIKA DIAZ ROMAN;  
 EDYN A. PALMA ROMAN; EDYN R. PALMA  
 ACEITUNA; JUAN IRIZARI TORRES; CARMEN  
 AQUINO BORGES; JOEL E. IRRIZARI AQUINO;  
 LIZA IRRIZARI AQUINO; CARMEN HAYDEE  
 MENDEZ; ENRIQUE SAMPAYO MORENO;  
 ENRIQUE SAMPAYO MENDEZ; ANIBAL  
 GONZALEZ RAMOS; MARIBEL OLMO; BRIGITTE  
 GONZALEZ OLMO; ANIBAL M. GONZALEZ  
 OLMO; LUIS E. AVILES GONZALEZ; NORMA I.  
 RIVERA; DANIELISE OQUENDO; EDELMIRO  
 MALDONADO MALDONADO; CARMEN M .VEGA  
 ROSARIO; JONATAHN CASTRO RIVERA;  
 NICOLE REESE; HARRY MELENDEZ  
 FERNANDEZ; JOSEFINA RIVERA SOSTRE;  
 RICHARD ROSARIO RIVERA; CARMEN J. RIOS  
 RIVERA; CARLA ROCIO LOPEZ RIOS; ESTHER  
 QUILES BARRETO; MONICA MIRANDA CRUZ;  
 JUAN P. CINTRON CUADRADO; LOURDES M.  
 CRUZ BOCALEGRA; MARIA T. RIVERA  
 RODRIGUEZ; JOSE L. ROMAN SERRANO; LUZ  
 MINERVA HERNANDEZ COSME; MARIANELA  
 DELGADO TORRES; ALANA RIVERA DELGADO;  
 ALAN RIVERA RUIZ; YASMIN MARRERO VEGA;  
 FRANCISCO CASIANO MELEDEZ; GLADYS  
 CRUZ RODRIGUEZ; JAKEISHA CASIANO  
 RIVERA; RONALDO ROBLES MENDEZ; DALMA  
 VILLAHERMOSA MARTINEZ; HOWARD  
 RAMIREZ VILLAHERMOSA; RONALDO ROBLES  
 ACEVEDO; JEAN MICHAEL BODNER; CYNTHIA  
 DEL VALLE; MICHAEL BODNER DEL VALLE;  
 JEANCY BODNER DEL VALLE; IVETTE LOPEZ  
 CUEVAS; DIANA OYOLA BAEZ; JAVIER MORO  
 CRUZ; GLADYS COLON ROSADO; LETICIA  
 OLIVERAS TORRES; SERGIO SANCHEZ  
 POSSE; JARANAIZA TORO CAMACHO;  
 ANTONIO CAMACHO VARGAS; MARIA  
 CAMACHO VARGAS; AIDA CAMACHO VARGAS;  
 JANIEL TORO CAMACHO; JADELYS MATOS  
 TORO. JOSHUA TORO CAMACHO; MARIA C.  
 VARGAS MONTIJO; REGINO COLON NIEVES;  
 DAISY ORELLANA NIEVES; JORGE CAMARERO  
 ORRELLANA; ROSA M. GUZMAN RIVERA;  
 CHRISTIAN NIEVES ORELLANA; PICART  
 GUZMAN; LUZ MARIE CARVENTE GUZMAN;  
 LEONARDO MALDONADO CASTRO;

CRISTOBAL LOPEZ; ILEANA SANCHEZ  
 MORALES; PABLO M. HERNANDEZ SANCHEZ;  
 JEAN C. ORTIZ; HELBERT H. ORTIZ; VICTORIA  
 PIZARRO LOPEZ; ADRIAN DELBREY PIZARRO;  
 MILDRED ORTEGA GOMEZ; MARIA GOMEZ  
 SEVILLA; RAMON ORTEGA RAMOS; EDITH M.  
 HUERTAS TORRES; MANUEL HUERTAS  
 OCASIO; ROBERTO BAEZ ROBLES; CARMEN  
 D. HUERTAS RIVERA; CRUZ RODRIGUEZ  
 BURGOS; ELIZABETH RAMOS GONZALEZ;  
 GENARO CAMACHO; JERRY CAMACHO  
 RAMOS; KATHIA QUIÑONES RAMOS;  
 MICHELLE CARRION; ARACELIS SEPULVEDA  
 TRABAL; GLADYS JIMENEZ MARRENGO;  
 MELVIN VILLANUEVA JIMENEZ; IVETTE  
 VILLANUEVA JIMENEZ; CHRISTIAN  
 MONTAÑEZ VILLANUEVA; CORALIS NEGON  
 VILLANUEVA; LISSETTE DE JESUS RIVERA;  
 RAFAEL ROSARIO MELENEDEZ; PAOLA  
 NICOLE ROSARIO DE JESUS; RAFAEL  
 ROSARIO DE JESUS; WILBERTO MARRERO  
 GONZALEZ; JAVIER MOJICA MELENDEZ;  
 JOHANNA COLON GOMEZ; DALIMAR MOJICA  
 MARCIAL; JEAN J. ARCE COLON; JANVIER  
 MOJICA COLON; BETSY MOLINA BENITEZ;  
 DANIEL A. MARTINEZ MOLINA; JONATAN G.  
 MARTINEZ MOLINA; MARIA M. RIVERA ORTIZ;  
 RICHARD ECKERT; ISAAC ECKERT RIVERA;  
 JOSHUA ECKERT RIVERA; NAOMI ECKERT;  
 MIRIAM FLORES DE JESUS; RUTH SILVA  
 PEREZ; MARIA V. VIRUETT MARTEL; MIRIAM  
 DE JESUS; VICTOR A. MERCADO; MARIA  
 ALTIERI MARIOT; WILLIAM PADIN FREYRE;  
 ZORAIDA NIEVES GONZALEZ; MIGUEL A.  
 FERRER SANTOS; ANDREA FERRER NIEVES;  
 YALIZ V. FERRER NIEVES; SAMUEL NIEVES  
 GONZALEZ; MIGUEL RASADO SANTIAGO;  
 AUEREA ROSADO ROSADO; MARITZA  
 ROSADO ROSADO; DAVID RODRIGUEZ  
 ROSADO; SARIM MALDONADO CANCIO;  
 JOSHUA O. SALAS MALDONADO; ELLIOT  
 SALAS MALDONADO; SAMARIE FUENTES  
 MALDONADO; YAZARETH FUENTES  
 MALDONADO; DANIEL RODRIGUEZ ORTIZ;  
 SONIELY MARTINEZ ROSADO; ANGEL E.  
 RODRIGUEZ MARTINEZ; ELIEZER RODRIGUEZ  
 MARTINEZ; VIVIANETTE MEDINA FLORES;  
 EDWIN J. JURADO MEDINA; YADIEL A. MEDINA  
 FLORES; PEDRO NAVARRO ACEVEDO; ANA M.  
 MORALES CRUZ; PABLO A. NAVARRO  
 MORALES; MATEO E. NAVARRO MORALES;  
 CARMEN MEJIA ROBELL; VICTOR ROSADO  
 ROSADO; CARMEN RIOLLANO MARRERO;  
 LISSETTE AYALA VIDAL; OMAYRA GARCIA  
 AYALA; WILFREDO OCASIO NARVAEZ;

YESENIA CAMPOS PIZARRO; KATHIRIA RIVERA CAMPO; JESNALY M. OCASIO CAMPO; HECTOR OLIVO CAMPO; JAVIER A. BAEZ PACHECO; VIVIAN M. ADORNO HERNANDEZ; LYDIA PACHECO ALMODOVAR; ISAAC O. LUGO ADORNO; ELBA I. MONTALVO SANCHEZ; MABELIZZA SOTO MELENDEZ; EDGAR ORTIZ SOTO; JOELIEL ORTIZ SOTO; DILIA VAZQUEZ CENTENO; JOSE ORTIZ MORALES; INES CENTENO SEVILLA; ANGEL R. VAZQUEZ VAZQUEZ; DILMARIE VAZQUEZ CONCEPCION; MARGARITA ROMAN GONZALEZ; ANDRES PAGAN MARTI; MAGALYS DAVILA RAMIREZ; JEAN D. PAGAN DAVILA; CRISTINA LOPEZ; AIDA GARCIA COLON; AILED RIVERA GARCIA; GIAN ROSARIO RIVERA; CARMELO GONZALEZ ANDUJAR; SAMARIA DIAZ GONZALEZ; ERIC VARGAS DIAZ; CARLOS ABRAHAM DUEÑO; DELIA GARCIA CRUZ; CARLOS GONZALEZ GARCIA; LUZ DIAZ DELGADO; CARLOS DE LA ROSA; BENJAMID DE LA ROSA; DELIA GARCIA CRUZ; SHARINETTE MORAN; FELIX PEREZ; CHYKINQUIRA PEREZ MORAN; MICHAEL PEREZ MORAN; OMYS PEREZ MORAN; CARLOS ORTIZ ROSA; MARIA DEL PILAR ARROYO FIGUEROA; ANA N. ORTIZ ARROYO; CARLOS E. ORTIZ ARROYO; ROSITA RODRIGUEZ ANDALUZ; ANGEL SANCHEZ MERCED; JUAN CARLOS CONTRERAS; AGNE M. CONTRERAS; RAUL ROSADO CRUZ; WANDA FEBUS BAEZ; JOSHUA PEREZ FEBUS; JEANELIS PEREZ FEBUS; JARELIS PEREZ FEBUS; ROBERTO RIOS ROSADO; SONIA RODRIGUEZ JIMENEZ; PEDRO J. LOPEZ AGOSTO; EVELYN POMALES AYALA; MARIANGELY LOPEZ POMALES; MELISSA F. PERELES LARACUENTE; ALONDRA M. RIVERA PERELES; GREGORIO GUERRIDO NEVAREZ; RAMIRO RIVERA AGOSTO; ROSSNELLY ALBALADEJO ALBALADEJO; RICHARD RIVERA ALBALADEJO; MICHELL RIVERA ALBALADEJO; CLARISSA OJEDA OCASIO; RICHARD CASIANO RIVERA; ASSIRA M. REYES OJEDA; RICHELY N. CASIANO RIVERA; JUAN ROSADO ROSADO; EDWIN MARTINEZ ROSADO; ISRAEL DEL VALLE SALDAÑA; CECINYD VAZQUEZ DEL VALLE; IVELISSE CRUZ CASTILLO; MARIA CINTRIN HUERTAS; DAYANARA DIAZ MONTALVO; DAMARIS CALDERON RODRIGUEZ; ABIYARIEL BOTLER RODRIGUEZ; MICHELLE OTERO RIVERA; HECTOR MUÑOZ FEBLES; ROSALINA CRUZ GARCIA; DAHIOMY M. ESPINOZA SANTIAGO; MELANIE ESPINOZA SANTIAGO; DAVID ESPINOZA RIVERA; MARIA P. GARCIA DONES; JESUS ROSADO ROSARIO;

JESSICA FERNANDEZ MALDONADO; STEVEN O. ROSADO FERNANDEZ; YEZIEL A. ROSADO FERNANDEZ; LUZ RODRIGUEZ FIGUEROA; ADOLFO LOPEZ RODRIGUEZ; MARIELA LOPEZ RODRIGUEZ; VICTORIA RIVERA REYES; JUAN ACOSTA HERNANDEZ; NYDIA SANCHEZ DIAZ; RAFAEL CLON MORALES; LUZ MARGARITA ROBLES ORAMAS; GLENDAMARY OTERO SANTIAGO; LUZ BELEN GUEVARA RIVERA; JOSE D. RODRIGUEZ RIVERA; AIDA LUZ RIVERA RODRIGUEZ; ERIC E. RODRIGUEZ RIVERA; MARA R. CURET ORTIZ; FELIX R. COLONDRES COLLAZO; JOSE SEPULVEDA TORRES; JAZMIN ALVAREZ TORRES, JOSE M. SEPULVEDA ALVAREZ; CARLOS GONZALEZ JORGE; LYDIA VAZQUEZ GUERRA; MARLENE M. GONZALEZ VAZQUEZ; REBECA M. GONZALEZ VAZQUEZ; ANA MERCEDES RIVERA; JOSE A. BERRIOS ROSADO; JOSE E. BERRIOS RIVERA; ANTONIA ANDINO NIEVES; EVELYN SANTIAGOCRUZ; NOEL HERNANDEZ SANTIAGO; MARIBEL SANTOS SANTOS; ANGELIZ ANDRADES SANTOS; ANGEL ANDRADES SANTOS; FREDMARIBELIZ DIAZ SANTOSDIANDRA CRUZ RODRIGUEZ; MAYRA MERCEDES VAZQUEZ RUZ; ADRIAN RIVERA CRUZ; HECTOR R. CRUZ HUERTAS; LOURDES I. COLON ROSA; JOSE LUIS GONZALEZ RODRIGUEZ; GUSTAVO J. GONZALEZ COLON; FRANCISCO RAMOS ORTIZ; LUISA ORTIZ CINTRON; JUAN MIGUEL RAMOS ORTIZ; JOSE M. RIVERA VELAZQUEZ; JOSEFINA HERNANDEZ PADILLA; TAINISHA MARTINEZ MENENEDEZ; LAURA SAMOT ROFRIGUEZ; SERAFINA MONTANEZ MARZAN; CARMEN OTERO FORTE; ELIEZER MENDES OTERO; JESSICA MENDEZ OTERO; JSEPHRILE ROMAN AHORRIO; LISSETTE DE JESUS RIVERA; PAOLA NICOLE ROSARIO DE JESUS; RAFAEL J. ROSARIO DE JESUS; NORMA ROJAS VAZQUEZ; AIDA LUZ BURGOS ROSA; ASHLEY A. CRUZ BURGOS; BRYAN CRUZ BURGOS ; ALONDRA COLON BURGOS; CARMEN M. NAVEDO ROSADO; EDWIN E. GARCIA MARTINEZ; OSCAR MORGADO NAVEDO; WANDA TORRES GARCIA; CARLOS SALAS ORTIZ; FRANCISCO GARCIA AMEZQUITA; FELICITA ROSADO QUINTERO; IVETTE Y. CENTENO PEREZ; ALFREDO AROCHO ORTIZ; CARLOS AROCHO CENTENO; ANTONIO OLIVERAS RIVERA; EVELYN CORREA GONZALEZ; ANTONIO OLIVERAS CORREA; NOEMI OTERO FUIGUEROA; SAMUEL OTERO RAMOS; MILAGROS FIGUEROA RODRIGUEZ; CARMEN RODRIGUEZ

HERNANDES; JUANI. DIAZ OTERO; MELINDA IGARTUA RIVERA; MANUEL ORTIZ MATIAS; MARIA ADORNO PINEIRO; AIRAM J. CURET ADORNO; JOHANNE GOMEZ SANTIAGO; EFRAIN BURGOS DOMINGUEZ; CHRISTIAN E. BURGOS GOMEZ; ZURISADAI BURGOS GOMEZ; ABDIEL GABRIEL BURGOS GOMEZ; MIGDALIA SOTO REYES; DAVID ROMAN ROMAND; DAVID ROAMN SOTO; DAVID E. MALDONADO RIOS; MARIA I. VALENTIN PAGAN; ANGEL MALDONADO VALENTIN; GABRIEL MALDONADO VALENTIN; JUAN E. DAVILA NEVAREZ; MILAGROS MATS ROSARIO; MARCOS MEDINA RAMOS; ALFREDO CLAS MATOS; ALEJANDRO MEDINA MATOS; EDWIN RIVERA FIGUEROA; NELSON RIVERA FIGUEROA; GRACE ALMESTICA MARRERO; MIGDALIA GARCIA RESTO; CATHY L. RUIZ GARCIA; JOE A. RUIZ GARCIA; FIAMA L. RUIZ GARCIA; MILTON SEPULVEDA CENTENO; MILAGROS GRAVAL RODRIGUEZ; RAMON FIGUEROA SALABARRIA; BRIGIDA SEPULVEDA SANTOS; RAMON L. FIGUEROA SEPULVEDA; ROSA ORTIZ AGOSTO; JOELYS CLAUDIO ORTIZ; JULIANIE RIVERA ORTIZ; GLADYS ADAMS DELGADO; LOURDES ARCHILLA DIAZ; NOELIA DIAZ MARRERO; TOMAS HERNANDEZ TORRES; EDWIN R. RIVERA MARTINZ; ANGELA; ANGELA HERNANDEZ MORALES; ADDILYS RIVERA HERNANDEZ; MICHELLE RIVERA HERNANDEZ; MELANIE RIVERA HERNANDEZ; CARLOS R. TEJERA GARCIA; ESMERALDA TORRES MERCADO; CARLOS S. TEJERA SERRANO; ADRIANA RAMIREZ TORRES; EVANGELY E. TJERA TORRES; NATHANIEL RAMIREZ TORRES; LANCA ALVAREZ SANABRIA; CECILIA I. BARBOSA PEDROSA; SERGIO DIAZ CARDONA; JOSE NEGRON DIAZ; CARMEN ALICIA BERDECIA ORTIZ; YAZMIN NEGRON BERDECIA; MARIA D. VAZQUEZ FORREZ; HECTOR ROSADO MONTES; KEDYCHA ROSADO ROSA; LESHKA ROSADO ROSA; LUIS A. COLON MELENDEZ; ZORAIDA ROSA GONZALEZ; ZORIELYZ COLON ROSA; ANA VALDES MORALES; ALANA RIVERA VALDES; RAMON A. ALMANAZAR ACOSTA; MARIA ORTIZ RODRIGUEZ; MIGDALIA LUGO SABALIER; CHRISTIAN BAEZ LUGO; EDRICK BAEZ LUGO; MARIBELIS PAGAN RIOS; ENRIQUE RIVERA PAGAN; DANIEL GONZALEZ CANCEL; EVELYN MUÑOZ; SONY GONZALEZ; ELSA GUZMAN NEGRON; CELIANNE GONZALEZ; GUZMAN; WILFREDO MENENDEZ SANTOS; HAYDEE M. BONILLA RIVERA; HAIDI

L. MENENDEZ BONILLA; HECTOR APONTE  
 MATINEZ; JOSE R. ORTIZ ALICEA; TAMARA  
     ADORNO FIGUEROA; DARLENE ORTIZ  
     ADORNO; DEREK J. NEGRON ORTIZ;  
 BENMARIS CRUZ GOMEZ; JOSE SOTO ROCA;  
     ANGEL R. MARRERO VALENTIN; ABIMAEI  
 MARRERO PABON; KIARA ANGELIE MARRERO  
 PABON; OLGA I. PABON BUYAT; WANDA CRUZ  
 MOJICA; AURELIA TORRES CRUZ; GLENDALIZ  
     TORRES CRUZ; ASHLEY TORRES CRUZ;  
     STEPHANIE TORRES CRUZ; ALONDRA M.  
 CRUZ MOJICA; CHRIS MARTINEZ DE JESUS;  
 ELIUD MENDEZ VAZQUEZ; NEREIDA MENDEZ  
     VAZQUEZ; SANTA RIVERA SANTIAGO;  
     JAHAIRA ORTIZ OSORIO; CARLOS A.  
 CABRERA,; CARLOS J. CABRERA ORTIZ;  
 ADRIANA N. CABRERA ORTIZ; ROSA HUARTE  
     RODRIGUEZ; IVAN BARRETI RODRIGUEZ;  
     GLADYS RODRIGUEZ FIGUEROA; EVELYN  
 CRUZ OTERO; CHRISTIAN A. RIVAS CRUZ;  
 MARIA VIRGINIA VARGAS ROSARIO; NEIL  
     SANTIAGO VAZQUEZ; JESUS O. NEILL  
 SANTIAGO VARGAS; DAVID M. SANTIAGO  
 VARGAS; JONATHAN GABRIEL SANTIAGO  
 VARGAS; ABIGAIL N. SANTIAGO VARGAS;  
 SONIA SANTIAGO RODRIGUEZ; ROBERT  
     ECHEVARRIAS GARCIA; ZULEIMA OSORIO  
 SANTIAGO; WANDA MONTES RIVERA; JORGE  
     GONZALEZ MARTINEZ; JORGE GONZALEZ  
 MONTES; ALADINO LOPEZ MARRERO; JUAN  
 CRUZ NEGRON; CARMEN LOPEZ RUIZ; JEAN  
 CRUZ LOPEZ; DARIANA CRUZ LOPEZ; LILIAN  
 IVETTE RODRIGUEZ IGUEROA; MARIA DE LOS  
     ANGELES FIGUEROA RIVERA; MILAGROS  
 MEJIAS AMPARO; MARIA MEJIAS AMPARO;  
     LUIS GUZMAN LUZON; CARLOS RIVERA  
     NIEVES; MARAMARITZ OLIVO NIEVES;  
     CARLOS YRIEL RIVERA OLIVO; HECTOR  
 CUBERO ROSADO; CARMEN JULIA AGUILERA  
     LOPEZ; CARMEN D. RIOS ORTEGA; RENE  
     ROSARIO RIOS; MARIA D. MONTALVO  
 MIRANDA; VILMARYS ACEVEDO MONTALVO;  
 CARLOS DANIEL CRUZ ACEVEDO; MARIA C.  
     PEREZ NEGRON; JOSE PEREZ NEGRON;  
     ORLANDO DAVILA MELENDEZ; ALBERTO  
     FIGUEROA MELENDEZ; GLADYS E. RIVERA  
 MELENDEZ; ALBERTO FIGUEROA MELENDEZ;  
     GLADYS E. RIVERA MELENDEZ; RAMON  
     SANTIAGO TORRES; JOSERT SANTIAGO  
 ORTIZ; MARIBEL BORRERO NATAL; GABRIEL  
     HUERTAS GONZALEZ; ZULEIKA HUERTAS  
 BORRERO; JOVANY G. HUERTAS RODRIGUEZ;  
     SHEILY M. HUERTAS BORRERO; MIGUEL  
     LOPEZ CRUZ; KENIEL LOPEZ HUERTAS;  
 YAXIEL LOPEZ HUERTAS; ROXANA SAAVEDRA

FIGUEROA; EULICES ALVAREZ RIVERA; ULIAN  
 A. ALVAREZ SAAVEDRA; DANIEL ROSARIO  
 RODRIGUEZ; ANGELICA M. ROSARIO  
 MONTALVO; STEPHANIE ANDINO; FELICITA  
 COLON TORRES; RAFAEL DEL VALLE; MILDIA  
 DIAZ MARTINEZ; GERMAN GONZALEZ IBARRA;  
 JOSE GONZALEZ AGOSTO; MARIA G.  
 BECERRIL RODRIGUEZ; LUIS G. NARVAEZ  
 BECERRUK; TANIA G. NARVAEZ BECERRIL;  
 JOSE DAVID ORTIZ MARTINEZ; YASMIN  
 MARRERO; ANGEL L. MORALES; RAFAEL  
 RIVERA, MARIA L. RUIZ RIVERA; JACKELINE  
 MATOS CASTRO; ALEXIS O. SOTO MATOS;  
 ANGELIVETTE SOTO MATOS; ORLANDO  
 RODRIGUEZ APONTE; ANGEL MORALES;  
 LUSTER VEGA FRAGASO; GENESIS ORTEGA  
 VEGA; EZEQUIEL ORTIZ RIVERA; LUIS A.  
 RIVERA RIVERA; JUAN ANDREU RODRIGUEZ;  
 MARIA IVETTE SALDANA BORRERO; EVELYN  
 BORRERO NATAL; APOLINAR SALDANA  
 VARGAS; HECTOR L. SALDANA VARGAS;  
 MILDRED M. NATASL ZAIN, GABRIEL HUERTAS  
 BORRERO; KEYLA OTERO RIVERA;  
 KEYSHNAILIS COLLAZO OTERO; ANGEL L.  
 RODRIGUEZ BURGOS; JOSE ENRIQUE RIVERA  
 OTERO; JOSE SUAREZ; NILDA ACEVEDO;  
 JOSE CORDOVA; MAC MALDONADO;  
 FERDINAND ORTIZ; RAMONA SANTOS  
 JIMENEZ; KATIRIA LOPEZ BERRIOS;  
 JUNNARYS COLON LOPEZ; MARIBEL ROBLES  
 ROSARIO; LUZ M. MOLINA ORTA; LIZBETH  
 BAEZ RETAMAR;; ENID SAINZ SANTANA; LUIS  
 A. RIVERA SAINZ; VIVIAN ADORNO  
 HERNANDEZ; LILIANA ORTIZ SANTIAGO;  
 SANTOS CANCEL ADORNO; GLORIA BAEZ  
 ROBLES; ENRIQUE A. VEGLIO GUZMAN;  
 MATILDE RAMIREZ GUZMAN; MELISSA  
 PARELES MARACUENTE; MARINA  
 MASTRODOMENICO; MARILYN BAEZ ROBLES;  
 MARIANO MORALES GONZALEZ; CARMEN  
 ROSA PABON SALGADO; LUZ M. GARCIA  
 CRUZ; GABRIEL VELAZQUEZ; ALFONSO  
 RODRIGUEZ ORTIZ; DARIBER RIVERA CRUZ;  
 LUZ DELIA CRUZ CONCEPCION; PABLO  
 RIVERA ARCE; DAYSIBELL CRUZ RODRIGUEZ;  
 RAMON RIVERA GONZALEZ; AMBAR PAULINO;  
 DAVID LABOY RIVERA; NATASHA LABOY;  
 JACKELINE MARRERO NIEVES; KEVIN  
 HERNANDEZ MARRERO, LUIS HERNANDEZ  
 MARRERO; ENEIDA KUILAN ROSARIO;  
 DANIRIS MARTINEZ FIGUERO; CARIDAD  
 LANDOR ROSADO; SOL M. RIVERA REYES;  
 EDNA FELIZ ORTIZ; FELICITA PABON BULLOT;  
 MARIA TERESA MRCADO PABON; CARMEN  
 GLADYS SANCHEZ; GABRIELA REYES

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SANTIAGO; BARBARA COLON PEREZ; PABLO  
 COLLAZO FIGUEROA; LUZ SANTANA  
 CINTRON; JESUS RIVAS CASTRO; MARGARITA  
 VIERA ECHEVARRIA; VANESS VALCARCEL  
 DIAZ; DANIEL HERNANDEZ LOPEZ; CLARISSA  
 OJEDA OCASIO; ASSIRA M. REYES OJEDA;  
 ADA L. MEDINA BAEZ; MILKA FORNES  
 DODONOS; DELIA REYES TORRES; CINTHYA  
 SUAREZ SIACCA; GERARDO VALLE; BRENDA  
 LIZ ROSA; LORIA RIVERA VELEZ; KENNETH  
 RIVERA VELEZ; MICHAEL ANTHONY  
 SANTIAGO RIVERA; GLORIAN SANTIAGO  
 RIVERA; JESSICA ARROYO LOPEZ; YAHAIRA  
 LOPEZ MUNIZ; MARIELY ONNA CASTELLANOS;  
 JOSE CAJIGAS RODRIGUEZ; FRANCISCO  
 REYES FLORES; KATHERINE BUTTER  
 FIGUEROA; NITZA TORRES PEREZ; WILLIAM  
 LOPZ ORTIZ; ANDRES PAGAN DAVILA; SONIA  
 RAMIREZ ROMAN; ROBERTO ROBLES  
 ROSARIO; LUZ GARCIA ROMAN; JOSE SOTO  
 FIGUEROA; MARISOL ROBLES ROSARIO;  
 SARALI SOTO ROBLES; GLORIA RODRIGUEZ  
 IRIZARRY; SANTOS SEVERINO MENA; JOSE  
 SEVERINO; SAY SEVERINO; ROMAN  
 SEVERINO; MARIANO MALDONADO PAGAN;  
 MARIO P. MALDONADO VAZQUEZ; RENE  
 COLON COLON; RAFAEL CORREA ROSARIO;  
 DAVIS SANTIAGO SANTIAGO; AXEL D.  
 RODRIGUEZ SOTO; JORGE CORIANO RIVERA;  
 WILFREDO CALDERN DEL VALLE; FRANCISCO  
 DISLA; LORENZO A. MARTIEZ; AGUSTIN AYALA  
 LOPEZ; RODOLFO RODRIGUEZ AGOSTO;  
 WALDERMER VAZQUEZ SIFONTE; ALBERTO  
 ESTEVES VERGNE; JESUS HERNAIZ RIVERA;  
 AGUSTIN BRACERO FELICIANO; LEOPOLDO  
 ROLDAN RIOS; ALEXIS LEBRON RIVERA; JUAN  
 CRUZ PEREZ; JOSE DE LA ROSA VALLE;  
 SAMMY M. DANUH GARCIA; EZEQUIEL LOPEZ  
 MARTINEZ; LUIS RIVERA NAZARIO; LUIS  
 FRANCO MATEO; VICENZO TROIA TORRES;  
 JORGE RAMOS CANCION; JUAN AGOSTO  
 ROMAN; ALEJO ORTIZ CALDERON CARLOS J.  
 ZARAGOZA FERNANDEZ; JAIRO GONZALEZ  
 FLORES; JONATHAN RIVERA MONGE; CARLOS  
 SALDANA GONZALEZ; HERIBERTO GARCIA  
 PARRA; JORGE SANCHEZ RAMOS; LUIS CRUZ  
 MARTINEZ; JOSE MEDINA SANCHEZ;  
 GREGORY GARCIA URRUTIA; FRANCISCO  
 CONCEPCION OQUENDO; LUIS ESTARELLA  
 AGUIRRE; ENRIQUE SANCHEZ MULERO;  
 ERICK COLLAZO ACEVEDO; HECTOR DE  
 JESUS; VICTOR M. SANCHEZ CASTILLO; LUIS  
 BONILLA RIVERA; WILFREDO OLMO ESTRADA;  
 JUAN CIRINO GONZALEZ; JORGE LUIS MARIN  
 ROBLES; BENJAMIN FONTANEZ FLORES;

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JUAN FIGUEROA TRINIDAD EDWIN  
 RODRIGUEZ FLORES; MIGUEL A. RIVERA  
 DELGADO; PEDRO ALEJANDRO RIOS;  
 FRANCISCO MORALES CORDOVA; AMAURY  
 FERRER MALDONADO; AGUSTIN LLEDO  
 TELLECHEA; MARIO RIVERA CORREA;  
 ESTHER CORREA REAL; AMNERIS ROSA  
 MERCADO; LUIS VARGAS; OLGA VARGAS;  
 LILLIAM VARGAS BERNIER; JOSE JAIME  
 TORRADO; ELIZABETH OJEDA; ANTONIO  
 NEGRONI; NILDA NEGRONI; JORGE PEDROZA  
 ARCE; ADA MEDINA; JUAN GIRAU COLON;  
 CONSEJO DE TITULARES COND. LAGO PLAZA;  
 CRUCITA VELAZQUEZ; DIANA CARABALLO;  
 HECTOR FIGUEROA RIVERA; LUIS ROMAN  
 FLORES; RAMON DIAZ ALONSO; LUIS J.  
 ROMAN; CHRISTIAN ROMAN; ALANIS ROMAN;  
 RAMON DIAZ ALONSO; MARIA COLON; JARIZA  
 CHEVERES MULETO; JARIELIS REYES;  
 RAMON RIVERA ROLON; CARLOS GARCIA  
 RODRIGUEZ; EFRAIN POSADA RONDON;  
 EFRAIN POSADA; MARGARITA TORRES  
 MATOS; MARIA ISABLE TORRES HERNANDEZ;  
 PROVIDENCIA DIAZ OLIVERAS; SAMUEL  
 SANTOS RIVERA; TERESA GARRASTEGUI  
 VAZQUEZ; VILMA OLAVARRIA GONZALEZ;  
 JORGE VALLE SOTO; LABAOLA FLORES VEGA;  
 HECTOR FIGUEROA RIVERA; LILLIAM  
 FIGUEROA; ANGEL M. TORRES ROSARIO;  
 MARIA SANTIAGO; CARMEN COLON QUILES;  
 FRANCISCO HUERTAS; FREDDY BRUNNET  
 FELICIANO; MILDRED ORTEGA; ERIC  
 HERNANDEZ; PAMELA RODRIGUEZ; CARMEN  
 D. ALEJANDRO; DOMINGO DIAZ TORRES;  
 JENNY MELENDEZ MENDOZA; MARIA L.  
 MELENDEZ MENDOZA; FELIX PEREZ  
 MELENDEZ; JOHNNY MARRERO RIVERA;  
 NILSA RODRIGUEZ SERRANO; ANGEL L.  
 BARBOSA MARTINEZ, LUIS D. BARBOSA;  
 CORALINA OTERO RIVERA; ANA DAISY  
 GONZALEZ; ANTONIO ORTIZ NOGUE; KEYLA  
 ARIANIS ORTIZ; LILIVETTE ORTIZ GONZALEZ;  
 ORLANDO NIEVES RIVERA; ANDRES MEDINA  
 PABON; ANA M. CINTRON MIRANDA; GASPAR  
 CRUZ GASCOT; JOSE ELIEL CRUZ; RECHAN  
 CRUZ CINTRON; SONYA CRUZ CINTRON;  
 MARIBELLY PAGAN RIOS; MARIA TOMASA  
 RIOS ORTEGA; CARMEN DELIA RIOS ORTEGA;  
 YAHAIRA PAGAN; ISABEL VELEZ PIZARRO;  
 ANTONIO VELEZ CORDERO; JOELIANY CRUZ  
 SUAREZ; JOELIER CRUZ CINTRON; JULIO A.  
 GONZALEZ COLON; PEDRO PEREZ NIEVES;  
 ORLANDO ROBLES LOZADA; JOSE R. RIVERA  
 MALDONADO; MONSELA QUINONES AMBERT;  
 VIRGEN CARABALLO VAZQUEZ; MANOLIN

MARTINEZ NEGRON; MIGUEL GOMEZ DELGADO; AURELIA DELGADO ORTEGA; MIGUEL A. ROSARIO PEREZ; JOSE REYES MORALES; GIOVANNI CANALES MORALES; OMAR NIEVES RIVERA; JACQUELINE MARRERO RIVERA; AYEISHA PEREZ MEDINA; VICMARIE PEREZ MEDINA; CARLOS SANCHEZ; DAYSHALY SANCHEZ; CARLOS SANCHEZ; VICTOR SUAREZ; TATIANA COSME; JESUS PADILLA; LIDELISSE CRUZ; LUZ E. SANCHEZ; YOCELYN RAMIREZ; FRANCISCA RODRIGUEZ; SHAQILE RODRIGUEZ; NESTOR J. SANCHEZ; RAMON SUAREZ REYES; GLROIA REYES MAYSONET; JOSE HERNANDEZ SANTANA; JUAN RAMOS ORTIZ; LOURDES ORTIZ COMAS; CARLOS SERRANO TORRES; ROSA REYES; EDWIN ACEVEDO RODRIGUEZ; HARRY J. CLAUDIO COLON; MARIA RIVERA; JOSE VILLANUEVA; RICARDO SERRANO TORRES; CARLOS GARCIA AYALA; JUAN ANTONIO ORTIZ; MIGUEL ERAZO; JEANNETTE M. GONZALEZ; EVELYN MUÑOZ; DANIEL GONZALEZ; LUCY GONZALEZ; MILTON MORALES; JULIO RIOS MAYSONET; RAMON ANDINO; JUAN ORTIZ; MARIA VALENTIN; BENITO HERNANDEZ; NANCY SANTOS; JULIA OLIVO; EDGAR SANTOS; ISMAEL RIVERA; LIMARIS RIVERA; JUDITH ROBLESLOZADA; JOSE LUIS REYES; PAOLA REYES; JOSE REYES; PAULINA REYES; KRYSTAL REYES; CARMEN M. ROBLES; RAMON ROBLES; JOSE HERNANDEZ; MARCELINO HERNANDEZ; GASPAR CRUZ GASCOT; ANA CINTRON MIRANDA; PEDRO SANTOS; ROSA M. ORTIZ LOZADA; MARIA DEL C. RAMIREZ; DANIEL CRUZ PAGAN; NEISHMALI CASTRO DE JESUS; MARCO A. ROSADO GARCIA; SANDRA ROBLES RIOS; GLORIMAR MACHADO; VIVIAN TORRES; SAMUEL SANCHEZ; ANGEL L. CLAUDIO; ANTONIO ABREU; ANGEL FIGUEROA MERCED; VIRGINIA ORTIZ GOMEZ; ELIZA HUMPIERRE FIGUEROA; ROSA FIGUEROA ORTIZ; JUAN MALDONADO BENITEZ; MILAGROS ORTIZ RIVERA; EDNA L. GONZALEZ NAZARIO; JOSE R. CARRERAS HUERTAS; MARIA DEL C. CORDERO RODRIGUEZ; ILEANA VELEZ QUINONES; WILFREDO APONTE ORTIZ; HELEN NEGRON QUINONES; HECTOR HERNANDEZ HERNANDEZ; NILSA RODRIGUEZ SERRANO; MORAIMA CORDOVA COLON; JAVIER PANTOJAS ORTIZ; LUIS GUZMAN MARRERO; JONATHAN PEREZ PARIS; RAFAEL AVILES MOLINA; JOSE OLMEDA MIRANDA; JOSUE NIEVES PADILLA; RAUL MORENO SOLER;

ELLIOT DONES RAMOS; ISMAEL AGUEDA BAEZ; PEDRO LOPEZ MOJICA; HECTOR ADORNO VAZQUEZ; MIGUEL T. CORTES MALDONADO; JOSE TORRES COLON; DAMIAN RODRIGUEZ MERCED; JOE R. FLORES ALAMO; ORLANDO PEREZ CUADRADO; ROBERTO ARGUELLE SERRANO; CARLOS COLON BONET; JOSE ROSA CALDERON; CARLOS LAUREANO ROSA; JOSE CRUZ FERRER; REY A. SIERRA FELICIANO; ANGEL MORENO VAZQUEZ; OSVALDO CRUZ CHAPARRO; WILFREDO BAEZ ACOSTA; HECTOR TORRES VEGA; JOSE TEXIDOR PEREZ; EFREN RUIZ RAMOS; ANGEL TORRES VEGA; MARVIN HERNANDEZ MEDINA; JUAN CARLOS GIL CLAUDIO; JOSE VAZQUEZ AROCHO; STEVEN RUIZ ACEVEDO; ALFREDO NARVAEZ NEGRON; MARTIN VAZQUEZ VAZQUEZ; HECTOR MORALES ORTIZ; JUNILER RAMOS REYES; LUZ CELENIA BARBOSA RODRIGUEZ; JUAN RAMON MENDEZ CARDONA; MAYDA ROLDAN ALMEIDA; JORGE RIVERA RIVERA; DOMINGO SALICRUP DE JESUS; ROSA DOMENECH GUZMAN; CARLOS E. FIGUEROA; CARMELO PINERO BERRIOS; VICTOR A. DE JESUS RIVERA; MARIA LANDOR; YAMILETE BERMUDEZ RODRIGUEZ; ESTHER MARIE VELAZQUEZ BREA; GENESIS ROJAS MARTINEZ; GABRIEL MALDONADO VALENTIN; OMAIRA RIVERA RODRIGUEZ; JEAN ALBERT COLON RIVERA; OMARIS ORTIZ RIVERA; ANNETTE MANGUAL RIVERA; ANA IRIS CABRERA VAZQUEZ; KEYSHA MARIE ORTIZ CABRERA; CESHLIANN ORTIZ CABRERA; NASHALY ORTIZ CABRERA; IDELISSA K. GUTIERREZ SANTIAGO; EDWIN NIEVES COLON; CECILIO IZQUIERDO MATIAS; CARMEN LOPEZ GARCIA; GENESIS MALLOL; DIOMEDES E. GONZALEZ RAMOS; JORGE M. REYES; CARLOS I. SANCHEZ PEREZ; KENNETH ROMAN BERMUDEZ; ALICIA RODRIGUEZ BELLO; ANGEL R. RIVAS BERRIOS; JORGE ARTEAGA ORTEGA; NELIDA HUERTAS; ZAIMARA ROSADO HUERTAS; ROSA A. CRISTOBAL OCASIO; JOEL RIVERA RIVERA; DAIDREE ELAIN ALVARADO SOISA; JESUS HERNANDEZ ALVAREZ; CHRISTIAN ORTIZ LLOPIZ; CHRISTOPHER ORTIZ LLOPIZ; JESUS HERNANDEZ LLOPIZ; GENESIS MARCIAL GINES; MARIA BETANCES SOSA; DOLORES A. ROSARIO; CARLOS I. SANCHEZ PEREZ; JORGE M. REYES; DIOMEDES E. GONZALEZ RAMOS; KRYZIA E. PEREZ DOMENECH; DINIANN BERRIOS PEREZ; RAMON F. ALVARADO ENCARNACION;

DAIDREE ELAIN SOISA ALAMO; AURA INES BLAY REYES; LYDIA ESTHER CRUZ RIVERA; WILLIAM JESUS MARTINEZ CRUZ; ARMANDO OQUENDO; JERIELIS M. HERNANDEZ LOZADA; JERIEL J. HERNANDEZ LOZADA; JERRY ERICK HERNANDEZ SERRANO; ANGEL M. SANCHEZ SAEZ; ALEX G. PAGAN DAVILA; ANDRES O. PAGAN DAVILA; GILBERT E. MERCED MORENO; JORGE BECERRIL RODRIGUEZ; LUIS R. OCASIO DELGADO; ASHLY E. GONZALEZ MATOS, AIDA T. ESCUDERO MATOS; LILLIAM RODRIGUEZ; MARIA ESTHER MARTINEZ; RUBEN MALDONADO; RUBEN MALDONADO CORTES; FRANCES MALDONADO CORTES; ANNETTE MANGUAL RIVERA; ALENA V. SEPULVEDA JUSINO; GRISMARIE GARCIA RIVERA; HERIBERTO ORTIZ RIVERA; WANDA I. MORALES LOPEZ; JUAN CARLOS CORREA KUILAN; on behalf of themselves and all others similarly situated,

Plaintiffs  
vs.

ANTARES OIL SERVICES, LLC; REPSOL PETROLEO, S.A.; MAPFRE; ASTRA OIL COMPANY L.L.C.; ASTRA OIL TRADING LIMITED, NV; Chevron Corporation; VITOL SA, INC; INTERTEK GROUP PLC AND ITS DIVISION INTERTEK OIL CHEMICAL & AGRI (CALEB BRETT); RYTTSA, as Agents of Repsol Petroleo, S.A. and Repsol YPF Group Businesses.

Defendants

## COMPLAINT

Plaintiffs, Judith Alayon; Angel Claverol Rodriguez; Teresita Diaz Soto; Claudia Martinez Roja; Ana Santos Martinez; Frank Bayron Vigo; Frank Carlos Bayron Rodriguez; Gladys Rodriguez Ramos; Frank J. Bayron Rodriguez; Eladio Peres Perez; Margarita Sanchez; David Rivera Olivera Saltaliz; Elliot Marrero Ortega; David Rivera Santiago; Griselle Blondet Laboy; David A. Rivera Blondet; Darisel Rivera Blondet; Jose L. Rivera Rodriguez; Iris M. Caraballo Ayuso; Jose L. Rivera Caraballo; Natalia N. Rivera Caraballo; Omar Warner Patton; Angel L. Morales; Jose G. Maldonado; Nora N.

Gomez Molina; Camille A. Maldonado Gomez; Jose Lopez Guzman; Norman Lopez Guzman; Norma Guzman Santos ; Roberto Valdes Morales; Juan Carlos Cordova Davila; Rosa I. Torres Martinez; John Carlo Cordova Torres; Luis N. Puig Torres; Curcita Martinez Biera; Angel Robles Torres; Lara Luciano Lamourt; Maria M. Osoria Robles; Elizabeth Padilla Ortiz; Franciaco Marrero Colon; Zuleika Miranda Jimenez; Francisco Velez Arroyo; Marlenes Zulay Velez Miranda; Cristian M. Iglesias Miranda; Jhusthino Julier Miranda; Jorge Luis Galindo Figueroa; Aymara Galindo; Jorge Luis Galindo Ramirez; Jomar Luis Galindo Ramirez; Ramona Rivera Torres; Roberto Matos; Yesenia Martinez Cosme; Juan E. Negron Rios; Felix Ricardo Andres Rodriguez Martinez; Maria E. Lopez Ortiz; Mieguel A. Arce Lopez; Emily Arce Lopez; Miguel Angel Arce Negron; Anabelis Collazo Quiles; Suliymar Rosario Collazo; Richard Rosario Collazo; Xavier Omar Rosario Collazo; Maria Rivera Garay; Lizzy Marie Pagan Rivera; Adan Perez Barreto; Astrid Quiñinez Gonzalez; Abner Quiñones Gonzalez; Brendaliz Gonzalez Roman; Pedro Perez; Luz E. Rosario Hernandez; Jose Alberto Quiles Colon; Benjamin Caraballo; Lyllian Rodriguez Carabello; Joan Marie Castellano Rodriguez; Iris Rivera; Pedro J. Castellano Rodriguez; Jesus Manuel Rosario Molina; Luz E. Polanco Pabon; Juana Lopez Santana; Jeanitza Sainz Lopez; Jeimilitza Sainz Lopez; Julitza Sainz Lopez; Hector Lebron Ramos; Calros L. Rievar Montañez; Samuel Rivera Montañez; Diana Reyes Baez; Marcelino Rodriguez Gonzalez; Dijean Escobar Rivera; Jerry Juarbe Robles; Mariselis Muñiz; John W. Jenkinson; Catherine Kalantar; Milagros Castro Sanchez; Jose R. Reyes Ortiz; Jose Reyes Castro; Erika Roman Rivera; Niwdeika Diaz Roman; Edyn A. Palma Roman; Edyn R. Palma Aceituna; Juan Irizarri Torres; Carmen Aquino Borges; Joel E. Irrizari Aquino; Liza Irrizari Aquino; Carmen

Haydee Mendez; Enrique Sampayo Moreno; Enrique Sampayo Mendez; Anibal Gonzalez Ramos; Maribel Olmo; Brigitte . Gonzalez Olmo; Anibal M. Gonzalez Olmo; Luis E. Aviles Gonzalez; Norma I. Rivera; Danielise Oquendo; Edelmiro Maldonado Maldonado; Carmen M .Vega Rosario; Jonatahn Castro Rivera; Nicole Reese; Harry Melendez Fernandez; Josefina Rivera Sostre; Richard Rosario Rivera; Carmen J. Rios Rivera; Carla Rocio Lopez Rios; Esther Quiles Barreto; Monica Miranda Cruz; Juan P. Cintron Cuadrado; Lourdes M. Cruz Bocanegra; Maria T. Rivera Rodriguez; Jose L. Roman Serrano; Luz Minerva Hernandez Cosme; Marianela Delgado Torres; Alana Rivera Delgado; Alan Rivera Ruiz; Yasmin Marrero Vega; Francisco Casiano Meledez; Gladys Cruz Rodriguez; Jakeisha Casiano Rivera; Ronaldo Robles Mendez; Dalma Villahermosa Martinez; Howard Ramirez Villahermosa; Ronaldo Robles Acevedo; Jean Michael Bodner; Cynthia Del Valle; Michael Bodner Del Valle; Jeancy Bodner Del Valle; Ivette Lopez Cuevas; Diana Oyola Baez; Javier Moro Cruz; Gladys Colon Rosado; Leticia Oliveras Torres; Sergio Sanchez Posse; Jaranaiza Toro Camacho; Antonio Camacho Vargas; Maria Camacho Vargas; Aida Camacho Vargas; Janiel Toro Camacho; Jadelys Matos Toro. Joshua Toro Camacho; Maria C. Vargas Montijo; Regino Colon Nieves; Daisy Orellana Nieves; Jorge Camarero Orrellana; Rosa M. Guzman Rivera; Christian Nieves Orellana; Picart Guzman; Luz Marie Carvente Guzman; Leonardo Maldonado Castro; Cristobal Lopez; Ileana Sanchez Morales; Pablo M. Hernandez Sanchez; Jean C. Ortiz; Helbert H. Ortiz; Victoria Pizarro Lopez; Adrian Delbrey Pizarro; Mildred Ortega Gomez; Maria Gomez Sevilla; Ramon Ortega Ramos; Edith M. Huertas Torres; Manuel Huertas Ocasio; Roberto Baez Robles; Carmen D. Huertas Rivera; Cruz Rodriguez Burgos; Elizabeth Ramos Gonzalez;

Genaro Camacho; Jerry Camacho Ramos; Kathia Quiñones Ramos; Michelle Carrion; Aracelis Sepulveda Trabal; Gladys Jimenez Marrengo; Melvin Villanueva Jimenez; Ivette Villanueva Jimenez; Christian Montañez Villanueva; Coralis Negon Villanueva; Lissette De Jesus Rivera; Rafael Rosario Melenedez; Paola Nicole Rosario De Jesus; Rafael Rosario De Jesus; Wilberto Marrero Gonzalez; Javier Mojica Melendez; Johanna Colon Gomez; Dalimar Mojica Marcial; Jean J. Arce Colon; Janvier Mojica Colon; Betsy Molina Benitez; Daniel A. Martinez Molina; Jonatan G. Martinez Molina; Maria M. Rivera Ortiz; Richard Eckert; Isaac Eckert Rivera; Joshua Eckert Rivera; Naomi Eckert; Miriam Flores De Jesus; Ruth Silva Perez; Maria V. Viruett Martel; Miriam De Jesus; Victor A. Mercado; Maria Altieri Mariot; William Padin Freyre; Zoraida Nieves Gonzalez; Miguel A. Ferrer Santos; Andrea Ferrer Nieves; Yaliz V. Ferrer Nieves; Samuel Nieves Gonzalez; Miguel Rasado Santiago; Auerea Rosado Rosado; Maritza Rosado Rosado; David Rodriguez Rosado; Sarim Maldonado Cancio; Joshua O. Salas Maldonado; Elliot Salas Maldonado; Samarie Fuentes Maldonado; Yazareth Fuentes Maldonado; Daniel Rodriguez Ortiz; Soniely Martinez Rosado; Angel E. Rodriguez Martinez; Eliezer Rodriguez Martinez; Vivianette Medina Flores; Edwin J. Jurado Medina; Yadiel A. Medina Flores; Pedro Navarro Acevedo; Ana M. Morales Cruz; Pablo A. Navarro Morales; Mateo E. Navarro Morales; Carmen Mejia Robell; Victor Rosado Rosado; Carmen Riollano Marrero; Lisette Ayala Vidal; Omayra Garcia Ayala; Wilfredo Ocasio Narvaez; Yesenia Campos Pizarro; Kathiria Rivera Campo; Jesnaly M. Ocasio Campo; Hector Olivo Campo; Javier A. Baez Pacheco; Vivian M. Adorno Hernandez; Lydia Pacheco Almodovar; Isaac O. Lugo Adorno; Elba I. Montalvo Sanchez; Mabelizza Soto Melendez; Edgar Ortiz Soto; Joeliel Ortiz Soto; Dilia Vazquez Centeno; Jose Ortiz

Morales; Ines Centeno Sevilla; Angel R. Vazquez Vazquez; Dilmarie Vazquez Concepcion; Margarita Roman Gonzalez; Andres Pagan Marti; Magalys Davila Ramirez; Jean D. Pagan Davila; Cristina Lopez; Aida Garcia Colon; Ailed Rivera Garcia; Gian Rosario Rivera; Carmelo Gonzalez Andujar; Samaria Diaz Gonzalez; Eric Vargas Diaz; Carlos Abraham Dueño; Delia Garcia Cruz; Carlos Gonzalez Garcia; Luz Diaz Delgado; Carlos De La Rosa; Benjamid De La Rosa; Delia Garcia Cruz; Sharinette Moran; Felix Perez; Chykinquira Perez Moran; Michael Perez Moran; Omys Perez Moran; Carlos Ortiz Rosa; Maria Del Pilar Arroyo Figueroa; Ana N. Ortiz Arroyo; Carlos E. Ortiz Arroyo; Rosita Rodriguez Andaluz; Angel Sanchez Merced; Juan Carlos Contreras; Agne M. Contreras; Raul Rosado Cruz; Wanda Febus Baez; Joshua Perez Febus; Jeanelis Perez Febus; Jarelis Perez Febus; Roberto Rios Rosado; Sonia Rodriguez Jimenez; Pedro J. Lopez Agosto; Evelyn Pomales Ayala; Mariangely Lopez Pomales; Melissa F. Pereles Laracuente; Alondra M. Rivera Pereles; Gregorio Guerrido Nevarez; Ramiro Rivera Agosto; Rossnelly Albaladejo Albaladejo; Richard Rivera Albaladejo; Michell Rivera Albaladejo; Clarissa Ojeda Ocasio; Richard Casiano Rivera; Assira M. Reyes Ojeda; Richely N. Casiano Rivera; Juan Rosado Rosado; Edwin Martinez Rosado; Israel Del Valle Saldaña; Cecinyd Vazquez Del Valle; Ivelisse Cruz Castillo; Maria Cintrin Huertas; Dayanara Diaz Montalvo; Damaris Calderon Rodriguez; Abiyariel Botler Rodriguez; Michelle Otero Rivera; Hector Muñoz Febles; Rosalina Cruz Garcia; Dahiomy M. Espinoza Santiago; Melanie Espinoza Santiago; David Espinoza Rivera; Maria P. Garcia Dones; Jesus Rosado Rosario; Jessica Fernandez Maldonado; Steven O. Rosado Fernandez; Yeziel A. Rosado Fernandez; Luz Rodriguez Figueroa; Adolfo Lopez Rodriguez; Mariela Lopez Rodriguez; Victoria Rivera Reyes; Juan Acosta

Hernandez; Nydia Sanchez Diaz; Rafael Clon Morales; Luz Margarita Robles Oramas; Glendamary Otero Santiago; Luz Belen Guevara Rivera; Jose D. Rodriguez Rivera; Aida Luz Rivera Rodriguez; Eric E. Rodriguez Rivera; Mara R. Curet Ortiz; Felix R. Colondres Collazo; Jose Sepulveda Torres; Jazmin Alvarez Torres, Jose M. Sepulveda Alvarez; Carlos Gonzalez Jorge; Lydia Vazquez Guerra; Marlene M. Gonzalez Vazquez; Rebeca M. Gonzalez Vazquez; Ana Mercedes Rivera; Jose A. Berrios Rosado; Jose E. Berrios Rivera; Antonia Andino Nieves; Evelyn Santiagocruz; Noel Hernandez Santiago; Maribel Santos Santos; Angeliz Andrades Santos; Angel Andrades Santos; Fredmaribeliz Diaz Santosdiandra Cruz Rodriguez; Mayra Mercedes Vazquez Ruz; Adrian Rivera Cruz; Hector R. Cruz Huertas; Lourdes I. Colon Rosa; Jose Luis Gonzalez Rodriguez; Gustavo J. Gonzalez Colon; Francisco Ramos Ortiz; Luisa Ortiz Cintron; Juan Miguel Ramos Ortiz; Jose M. Rivera Velazquez; Josefina Hernandez Padilla; Tainisha Martinez Menenedez; Laura Samot Rofiguez; Serafina Montanez Marzan; Carmen Otero Forte; Eliezer Mendes Otero; Jessica Mendez Otero; Jsephrile Roman Ahorrio; Lissette De Jesus Rivera; Paola Nicole Rosario De Jesus; Rafael J. Rosario De Jesus; Norma Rojas Vazquez; Aida Luz Burgos Rosa; Ashley A. Cruz Burgos; Bryan Cruz Burgos ; Alondra Colon Burgos; Carmen M. Navedo Rosado; Edwin E. Garcia Martinez; Oscar Morgado Navedo; Wanda Torres Garcia; Carlos Salas Ortiz; Francisco Garcia Amezquita; Felicita Rosado Quintero; Ivette Y. Centeno Perez; Alfredo Arocho Ortiz; Carlos Arocho Centeno; Antonio Oliveras Rivera; Evelyn Correa Gonzalez; Antonio Oliveras Correa; Noemi Otero Fuigueroa; Samuel Otero Ramos; Milagros Figueroa Rodriguez; Carmen Rodriguez Hernandes; Juani. Diaz Otero; Melinda Igartua Rivera; Manuel Ortiz Matias; Maria Adorno Pineiro; Airam J. Curet

Adorno; Johanne Gomez Santiago; Efrain Burgos Dominguez; Christian E. Burgos Gomez; Zurisadai Burgos Gomez; Abdiel Gabriel Burgos Gomez; Migdalia Soto Reyes; David Roman Romand; David Roamn Soto;David E. Maldonado Rios; Maria I. Valentin Pagan; Angel Maldonado Valentin; Gabriel Maldonado Valentin; Juan E. Davila Nevarez; Milagros Mats Rosario; Marcos Medina Ramos; Alfredo Clas Matos; Alejandro Medina Matos; Edwin Rivera Firgueroa; Nelson Rivera Figueroa; Grace Almestica Marrero; Migdalia Garcia Resto; Cathy L. Ruiz Garcia; Joe A. Ruiz Garcia; Fiamma L. Ruiz Garcia; Milton Sepulveda Centeno; Milagros Graval Rodriguez; Ramon Figueroa Salabarria; Brigida Sepulveda Santos; Ramon L. Figueroa Sepulveda; Rosa Ortiz Agosto; Joelys Claudio Ortiz; Julianie Rivera Ortiz; Gladys Adams Delgado;Lourdes Archilla Diaz; Noelia Diaz Marrero; Tomas Hernandez Torres; Edwin R. Rivera Martinz; Angela; Angela Hernandez Morales; Addilys Rivera Hernandez; Michelle Rivera Hernandez;Melanie Rivera Hernandez; Carlos R. Tejera Garcia; Esmeralda Torres Mercado; Carlos S. Tejera Serrano; Adriana Ramirez Torres;Evangely E. Tjera Torres; Nathaniel Ramirez Torres; Lanca Alvarez Sanabria; Cecilia I. Barbosa Pedrosa; Sergio Diaz Cardona; Jose Negron Diaz; Carmen Alicia Berdecia Ortiz; Yazmin Negron Berdecia; Maria D. Vazquez Forrez; Hector Rosado Montes; Kedycha Rosado Rosa; Leshka Rosado Rosa;Luis A. Colon Melendez; Zoraida Rosa Gonzalez; Zorielyz Colon Rosa;Ana Valdes Morales; Alana Rivera Valdes; Ramon A. Almanazar Acosta; Maria Ortiz Rodriguez; Migdalia Lugo Sabalier; Christian Baez Lugo; Edrick Baez Lugo; Maribelis Pagan Rios; Enrique Rivera Pagan; Daniel Gonzalez Cancel; Evelyn Munoz; Sony Gonzalez; Elsa Guzman Negron; Celianne Gonzalez; Guzman; Wilfredo Menendez Santos; Haydee M. Bonilla Rivera; Haidi L. Menendez Bonilla; Hector

Aponte Martinez; Jose R. Ortiz Alicea; Tamara Adorno Figueroa; Darlene Ortiz Adorno; Derek J. Negron Ortiz; Benmaris Cruz Gomez; Jose Soto Roca; Angel R. Marrero Valentin; Abimael Marrero Pabon; Kiara Angelie Marrero Pabon; Olga I. Pabon Buyat; Wanda Cruz Mojica; Aurelia Torres Cruz; Glendaliz Torres Cruz; Ashley Torres Cruz; Stephanie Torres Cruz; Alondra M. Cruz Mojica; Chris Martinez De Jesus; Eliud Mendez Vazquez; Nereida Mendez Vazquez; Santa Rivera Santiago; Jahaira Ortiz Osorio; Carlos A. Cabrera,; Carlos J. Cabrera Ortiz; Adriana N. Cabrera Ortiz; Rosa Huarte Rodriguez; Ivan Barreti Rodriguez; Gladys Rodriguez Figueroa; Evelyn Cruz Otero; Christian A. Rivas Cruz; Maria Virginia Vargas Rosario; Neil Santiago Vazquez; Jesus O. Neill Santiago Vargas; David M. Santiago Vargas; Jonathan Gabriel Santiago Vargas; Abigail N. Santiago Vargas; Sonia Santiago Rodriguez; Robert Echevarrias Garcia; Zuleima Osorio Santiago; Wanda Montes Rivera; Jorge Gonzalez Martinez; Jorge Gonzalez Montes; Aladino Lopez Marrero; Juan Cruz Negron; Carmen Lopez Ruiz; Jean Cruz Lopez; Dariana Cruz Lopez;Lilian Ivette Rodriguez Igueroa; Maria De Los Angeles Figueroa Rivera; Milagros Mejias Amparo; Maria Mejias Amparo; Luis Guzman Luzon; Carlos Rivera Nieves; Maramaritz Olivo Nieves; Carlos Yriel Rivera Olivo; Hector Cubero Rosado; Carmen Julia Aguilera Lopez; Carmen D. Rios Ortega; Rene Rosario Rios; Maria D. Montalvo Miranda; Vilmarys Acevedo Montalvo; Carlos Daniel Cruz Acevedo; Maria C. Perez Negron; Jose Perez Negron; Orlando Davila Melendez; Alberto Figueroa Melendez; Gladys E. Rivera Melendez; Alberto Figueroa Melendez; Gladys E. Rivera Melendez; Ramon Santiago Torres;Josert Santiago Ortiz; Maribel Borrero Natal; Gabriel Huertas Gonzalez; Zuleika Huertas Borrero; Jovany G. Huertas Rodriguez; Sheily M. Huertas Borrero; Miguel Lopez Cruz; Keniel Lopez

Huertas; Yaxiel Lopez Huertas; Roxana Saavedra Figueroa; Eulices Alvarez Rivera; Ulian A. Alvarez Saavedra; Daniel Rosario Rodriguez; Angelica M. Rosario Montalvo; Stephanie Andino; Felicita Colon Torres; Rafael Del Valle; Milda Diaz Martinez; German Gonzalez Ibarra; Jose Gonzalez Agosto; Maria G. Becerril Rodriguez; Luis G. Narvaez Becerruk; Tania G. Narvaez Becerril; Jose David Ortiz Martinez; Yasmin Marrero; Angel L. Morales; Rafael Rivera, Maria L. Ruiz Rivera; Jackeline Matos Castro; Alexis O. Soto Matos; Anggelivette Soto Matos; Orlando Rodriguez Aponte; Angel Morales; Luster Vega Fragaso; Genesis Ortega Vega; Ezequiel Ortiz Rivera; Luis A. Rivera Rivera; Juan Andreu Rodriguez; Maria Ivette Saldana Borrero; Evelyn Borrero Natal; Apolinar Saldana Vargas; Hector L. Saldana Vargas; Mildred M. Natasl Zain, Gabriel Huertas Borrero; Keyla Otero Rivera; Keyshnailis Collazo Otero; Angel L. Rodriguez Burgos; Jose Enrique Rivera Otero; Jose Suarez; Nilda Acevedo; Jose Cordova; Mac Maldonado; Ferdinand Ortiz; Ramona Santos Jimenez; Katiria Lopez Berrios; Junnarys Colon Lopez; Maribel Robles Rosario; Luz M. Molina Orta; Lizbeth Baez Retamar;; Enid Sainz Santana; Luis A. Rivera Sainz; Vivian Adorno Hernandez; Liliana Ortiz Santiago; Santos Cancel Adorno; Gloria Baez Robles; Enrique A. Veglio Guzman; Matilde Ramirez Guzman; Melissa Pareles Maracuente; Marina Mastrodomenico; Marilyn Baez Robles; Mariano Morales Gonzalez; Carmen Rosa Pabon Salgado; Luz M. Garcia Cruz; Gabriel Velazquez; Alfonso Rodriguez Ortiz; Dariber Rivera Cruz; Luz Delia Cruz Concepcion; Pablo Rivera Arce; Daysibell Cruz Rodriguez; Ramon Rivera Gonzalez; Ambar Paulino; Davild Laboy Rivera; Natasha Laboy; Jackeline Marrero Nieves; Kevin Hernandez Marrero, Luis Hernandez Marrero; Eneida Kuilan Rosario; Daniris Martinez Figuero; Caridad Landor Rosado; Sol M. Rivera Reyes; Edna Feliz Ortiz; Felicita Pabon

Bullet; Maria Teresa Mrcado Pabon; Carmen Gladys Sanchez; Gabriela Reyes Santiago; Barbara Colon Perez; Pablo Collazo Figueroa; Luz Santana Cintron; Jesus Rivas Castro; Margarita Viera Echevarria; Vaness Valcarcel Diaz; Daniel Hernandez Lopez; Clarissa Ojeda Ocasio; Assira M. Reyes Ojeda; Ada L. Medina Baez; Milka Fornes Dodonos; Delia Reyes Torres; Cinthya Suarez Siacca; Gerardo Valle; Brenda Liz Rosa; Loria Rivera Velez; Kenneth Rivera Velez; Michael Anthony Santiago Rivera; Glorian Santiago Rivera; Jessica Arroyo Lopez; Yahaira Lopez Muniz; Mariely Onna Castellanos; Jose Cajigas Rodriguez; Francisco Reyes Flores; Katherine Butter Figueroa; Nitza Torres Perez; William Lopz Ortiz; Andres Pagan Davila; Sonia Ramirez Roman; Roberto Robles Rosario; Luz Garcia Roman; Jose Soto Figueroa; Marisol Robles Rosario; Sarali Soto Robles;Gloria Rodriguez Irizarry; Santos Severino Mena; Jose Severino; Say Severino; Roman Severino; Mariano Maldonado Pagan; Mario P. Maldonado Vazquez; Rene Colon Colon; Rafael Correa Rosario; Davis Santiago Santiago; Axel D. Rodriguez Soto; Jorge Coriano Rivera; Wilfredo Caldern Del Valle; Francisco Disla; Lorenzo A. Martiez; Agustin Ayala Lopez; Rodolfo Rodriguez Agosto; Waldermer Vazquez Sifonte; Alberto Esteves Vergne; Jesus Hernaiz Rivera; Agustin Bracero Feliciano; Leopoldo Roldan Rios; Alexis Lebron Rivera; Juan Cruz Perez; Jose De La Rosa Valle; Sammy M. Danuh Garcia; Ezequiel Lopez Martinez; Luis Rivera Nazario; Luis Franco Mateo; Vicenzo Troia Torres; Jorge Ramos Cancion; Juan Agosto Roman; Alejo Ortiz Calderon Carlos J. Zaragoza Fernandez; Jairo Gonzalez Flores; Jonathan Rivera Monge; Carlos Saldana Gonzalez; Heriberto Garcia Parra; Jorge Sanchez Ramos; Luis Cruz Martinez; Jose Medina Sanchez; Gregory Garcia Urrutia; Francisco Concepcion Oquendo; Luis Estarella Aguirre; Enrique Sanchez Mulero; Erick

Collazo Acevedo; Hector De Jesus; Victor M. Sanchez Castillo; Luis Bonilla Rivera; Wilfredo Olmo Estrada; Juan Cirino Gonzalez; Jorge Luis Marin Robles; Benjamin Fontanez Flores; Juan Figueroa Trinidad Edwin Rodriguez Flores; Miguel A. Rivera Delgado; Pedro Alejandro Rios; Francisco Morales Cordova; Amaury Ferrer Maldonado; Agustin Lledo Tellechea; Mario Rivera Correa; Esther Correa Real; Amneris Rosa Mercado; Luis Vargas; Olga Vargas; Lilliam Vargas Bernier; Jose Jaime Torrado; Elizabeth Ojeda; Antonio Negroni; Nilda Negroni; Jorge Pedroza Arce; Ada Medina; Juan Girau Colon; Consejo De Titulares Cond. Lago Plaza; Crucita Velazquez; Diana Caraballo; Hector Figueroa Rivera; Luis Roman Flores; Ramon Diaz Alonso; Luis J. Roman; Christian Roman; Alanis Roman; Ramon Diaz Alonso; Maria Colon; Jariza Cheveres Muleto; Jarielis Reyes; Ramon Rivera Rolon; Carlos Garcia Rodriguez; Efrain Posada Rondon; Efrain Posada; Margarita Torres Matos; Maria Isable Torres Hernandez; Providencia Diaz Oliveras; Samuel Santos Rivera; Teresa Garrastegui Vazquez; Vilma Olavarria Gonzalez; Jorge Valle Soto; Labaola Flores Vega; Hector Figueroa Rivera; Lilliam Figueroa; Angel M. Torres Rosario; Maria Santiago; Carmen Colon Quiles; Francisco Huertas; Freddy Brunnet Feliciano; Mildred Ortega; Eric Hernandez; Pamela Rodriguez; Carmen D. Alejandro; Domingo Diaz Torres; Jenny Melendez Mendoza; Maria L. Melendez Mendoza; Felix Perez Melendez; Johnny Marrero Rivera; Nilsa Rodriguez Serrano; Angel L. Barbosa Martinez, Luis D. Barbosa; Coralina Otero Rivera; Ana Daisy Gonzalez; Antonio Ortiz Nogue; Keyla Arianis Ortiz; Lilivette Ortiz Gonzalez; Orlando Nieves Rivera; Andres Medina Pabon; Ana M. Cintron Miranda; Gaspar Cruz Gascot; Jose Eliel Cruz; Rechani Cruz Cintron; Sonya Cruz Cintron; Maribelly Pagan Rios; Maria Tomasa Rios Ortega; Carmen Delia Rios Ortega;

Yahaira Pagan; Isabel Velez Pizarro; Antonio Velez Cordero; Joeliany Cruz Suarez; Joelier Cruz Cintron; Julio A. Gonzalez Colon; Pedro Perez Nieves; Orlando Robles Lozada; Jose R. Rivera Maldonado; Monsela Quinones Ambert; Virgen Caraballo Vazquez; Manolin Martinez Negron; Miguel Gomez Delgado; Aurelia Delgado Ortega; Miguel A. Rosario Perez; Jose Reyes Morales; Giovanni Canales Morales; Omar Nieves Rivera; Jacqueline Marrero Rivera; Ayeisha Perez Medina; Vicmarie Perez Medina; Carlos Sanchez; Dayshaly Sanchez; Carlos Sanchez; Victor Suarez; Tatiana Cosme; Jesus Padilla; Lidelisse Cruz; Luz E. Sanchez; Yocelyn Ramirez; Francisca Rodriguez; Shaqile Rodriguez, Nestor J. Sanchez; Ramon Suarez Reyes; Giroia Reyes Maysonet; Jose Hernandez Santana; Juan Ramos Ortiz; Lourdes Ortiz Comas; Carlos Serrano Torres; Rosa Reyes; Edwin Acevedo Rodriguez; Harry J. Claudio Colon; Maria Rivera; Jose Villanueva; Ricardo Serrano Torres; Carlos Garcia Ayala; Juan Antonio Ortiz; Miguel Erazo; Jeannette M. Gonzalez; Evelyn Munoz; Daniel Gonzalez; Lucy Gonzalez; Milton Morales; Julio Rios Maysonet; Ramon Andino; Juan Ortiz; Maria Valentin; Benito Hernandez; Nancy Santos; Julia Olivo; Edgar Santos; Ismael Rivera; Limaris Rivera; Judith Robleslozada; Jose Luis Reyes; Paola Reyes; Jose Reyes; Paulina Reyes; Krystal Reyes; Carmen M. Robles; Ramon Robles; Jose Hernandez; Marcelino Hernandez; Gaspar Cruz Gascot; Ana Cintron Miranda; Pedro Santos; Rosa M. Ortiz Lozada; Maria Del C. Ramirez; Daniel Cruz Pagan; Neishmali Castro De Jesus; Marco A. Rosado Garcia; Sandra Robles Rios; Glorimar Machado; Vivian Torres; Samuel Sanchez; Angel L. Claudio; Antonio Abreu; Angel Figueroa Merced; Virginia Ortiz Gomez, Eliza Humpierre Figueroa; Rosa Figueroa Ortiz; Juan Maldonado Benitez; Milagros Ortiz Rivera; Edna L. Gonzalez Nazario; Jose R. Carreras Huertas;

Maria Del C. Cordero Rodriguez; Ileana Velez Quinones; Wilfredo Aponte Ortiz; Helen Negron Quinones; Hector Hernandez Hernandez; Nilsa Rodriguez Serrano; Moraima Cordova Colon; Javier Pantojas Ortiz; Luis Guzman Marrero; Jonathan Perez Paris; Rafael Aviles Molina; Jose Olmeda Miranda; Josue Nieves Padilla; Raul Moreno Soler; Elliot Dones Ramos; Ismael Agueda Baez; Pedro Lopez Mojica; Hector Adorno Vazquez; Miguel T. Cortes Maldonado; Jose Torres Colon; Damian Rodriguez Merced; Joe R. Flores Alamo; Orlando Perez Cuadrado; Roberto Arguelle Serrano; Carlos Colon Bonet; Jose Rosa Calderon; Carlos Laureano Rosa; Jose Cruz Ferrer; Rey A. Sierra Feliciano; Angel Moreno Vazquez; Osvaldo Cruz Chaparro; Wilfredo Baez Acosta; Hector Torres Vega; Jose Texidor Perez; Efren Ruiz Ramos; Angel Torres Vega; Marvin Hernandez Medina; Juan Carlos Gil Claudio; Jose Vazquez Arocho; Steven Ruiz Acevedo; Alfredo Narvaez Negron; Martin Vazquez Vazquez; Hector Morales Ortiz; Juniler Ramos Reyes; Luz Celenia Barbosa Rodriguez; Juan Ramon Mendez Cardona; Mayda Roldan Almeida; Jorge Rivera Rivera; Domingo Salicrup De Jesus; Rosa Domenech Guzman; Carlos E. Figueroa; Carmelo Pinero Berrios; Victor A. De Jesus Rivera; Maria Landor; Yamilete Bermudez Rodriguez; Esther Marie Velazquez Brea; Genesis Rojas Martinez; Gabriel Maldonado Valentin; Omaira Rivera Rodriguez; Jean Albert Colon Rivera; Omaris Ortiz Rivera; Annette Mangual Rivera; Ana Iris Cabrera Vazquez; Keysha Marie Ortiz Cabrera; Ceshliann Ortiz Cabrera; Nashaly Ortiz Cabrera; Idelissa K. Gutierrez Santiago; Edwin Nieves Colon; Cecilio Izquierdo Matias; Carmen Lopez Garcia; Genesis Mallol; Diomedes E. Gonzalez Ramos; Jorge M. Reyes; Carlos I. Sanchez Perez; Kenneth Roman Bermudez; Alicia Rodriguez Bello; Angel R. Rivas Berrios; Jorge Arteaga Ortega; Nelida Huertas; Zaimara Rosado Huertas; Rosa

A. Cristobal Ocasio; Joel Rivera Rivera; Daidree Elain Alvarado Soisa; Jesus Hernandez Alvarez; Christian Ortiz Llopiz; Christopher Ortiz Llopiz; Jesus Hernandez Llopiz; Genesis Marcial Gines; Maria Betances Sosa; Dolores A. Rosario; Carlos I. Sanchez Perez; Jorge M. Reyes; Diomedes E. Gonzalez Ramos; Kryzia E. Perez Domenech; Diniann Berrios Perez; Ramon F. Alvarado Encarnacion; Daidree Elain Soisa Alamo; Aura Ines Blay Reyes; Lydia Esther Cruz Rivera; William Jesus Martinez Cruz; Armando Oquendo; Jerielis M. Hernandez Lozada; Jeriel J. Hernandez Lozada; Jerry Erick Hernandez Serrano; Angel M. Sanchez Saez; Alex G. Pagan Davila; Andres O. Pagan Davila; Gilbert E. Merced Moreno; Jorge Becerril Rodriguez; Luis R. Ocasio Delgado; Ashly E. Gonzalez Matos, Aida T. Escudero Matos; Lilliam Rodriguez; Maria Esther Martinez; Ruben Maldonado; Ruben Maldonado Cortes; Frances Maldonado Cortes; Annette Mangual Rivera; Alena V. Sepulveda Jusino; Grismarie Garcia Rivera; Heriberto Ortiz Rivera; Wanda I. Morales Lopez; Juan Carlos Correa Kuilan; (“Plaintiffs”), bring this action against the defendants identified below (collectively “Defendants”), and aver as follows:

### **INTRODUCTION**

1.

This is an action to recover damages suffered by Plaintiffs as a result of the explosion and fire of approximately twenty-one fuel storage tanks that occurred on October 23, 2009 at about 12:30 a.m., at the Gulf Oil Facility (the “Gulf Oil Facility”) (which consists of a petroleum refinery, marine dock/terminal, pipelines and storage tanks) owned and/or operated by Caribbean Petroleum Corporation (“CPC”) and/or Caribbean Petroleum Refining LP (“CPR”), located in Bayamón, Puerto Rico. The

explosion occurred while the M/T Cape Bruny was unloading its cargo of 278,658 G.V.S. Barrels of highly flammable fuel (regular unleaded gasoline) at the marine dock/terminal and into five storage tanks, Nos. 405, 504, 411, 107 and 409. The MT Cape Bruny had unloaded 139,568.20 GSV barrels of fuel into tanks Nos. 405, 504 and 411 and was in the process of unloading the balance of its cargo (fuel) into tanks Nos. 107 and 409 when the explosion occurred. The M/T Cape Bruny pumped too much of its cargo (fuel) into the pipelines that connect the marine dock/terminal to the storage tanks, thereby causing the recipient storage tanks (Nos. 107 and 409) to overflow without detection. As the cargo (fuel) spilled, it spread and vaporized across the Gulf Oil Facility. The fuel found a source of ignition, causing the explosion. The Gulf Oil Facility's computerized monitoring system was not operational. The Gulf Oil Facility employees and agents involved in the operation failed to monitor the fuel level of the tank. The explosion and the resulting firewall cloud of thick dark smoke spread hazardous substances over large parts of the City of San Juan, Puerto Rico, and Bayamon and adjacent municipalities, causing physical injury, emotional damages, and damaging the homes, buildings, businesses and property of Plaintiffs, and causing other injuries to them. Plaintiffs have filed other suits against other parties responsible for the damages suffered by Plaintiffs and are filing this suit because they have discovered the involvement of the parties named as Defendants herein.

## **PARTIES**

2.

Plaintiffs are citizens of Puerto Rico, who reside and are domiciled within this district. As a result of the explosion's blast, Plaintiffs suffered physical and emotional

injuries inhaled toxic fumes, were intoxicated and had to evacuate their homes right after the first blasts occurred at the Gulf Oil Facility. Their homes, buildings, businesses and property suffered damages as a result of the explosion and fire. Plaintiffs were unable return to their homes for several days after the explosion and they have suffered other damages as further described below.

3.

Made Defendants herein are the parties identified below, who are collectively referred to as "Defendants":

- a. Antares Oil Services LLC ("Antares"), a Connecticut corporation with offices at 92 Arcadia Ave., Bridgeport, Ct. 06604. Antares provided technical support services and managed the transportation, offloading and delivery of fuel from the M/T Cape Bruny at the time of the explosion described above. Antares, along with other entities described below had a duty to insure that the receiving tanks and equipment were in proper condition to receive the fuel, and had other duties that are described below.
- b. Repsol Petroleo S.A., ("Repsol"), a Spanish Corporation with its headquarters at Paseo de la Castellana 278-280, Madrid, Spain. Repsol was, upon information and belief, the voyage charterer of the M/T Cape Bruny at the time of the explosion described above.
- c. MAPFRE, a Spanish insurance company located in Majabahonds, Spain. MAPFRE, upon information and belief, provided insurance coverage for

the voyage charter of the M/V Cape Bruny at the time of the explosion described above.

- d. Astra Oil Company L.L.C. (“Astra Oil”), a Florida corporation with offices at 301 Main Street, Ste. 201, Huntington Beach, California. Astra Oil was engaged in the transportation and/or delivery of the petroleum product described above at all times referenced herein. Astra Oil, acting on behalf of its related company Astra Oil Trading, NV, was a designated receiver of the petroleum product. As such, it had a duty to insure that the receiving tanks and equipment were in proper condition to receive the product and that the receiving operations were carried out properly.
- e. Astra Oil Trading Limited, NV (“Astra Oil Trading”), a company based in the Netherlands. Astra Oil Trading, acting through its related company Astra Oil, was engaged in the transportation and/or delivery of the petroleum product described above at all times referenced herein. Astra Oil Trading was a designated receiver of the petroleum product. As such it had a duty to insure that the receiving tanks and equipment were in proper condition to receive the product and that the receiving operations were carried out properly.
- f. Chevron Corporation (“Chevron”), a Delaware corporation that is in the business of, among other things, refining, distribution and sale of petroleum products; and, upon information and belief, owned some of the fuel and ultra hazardous and explosive products that were stored at the Gulf Oil Facility on October 23, 2009, which burned or exploded.

- g. VITOL S.A., Inc. ("VITOL") a foreign company with offices at 1100 Louisiana Street, Suite 5500 Houston, Texas, is a distributor, seller and merchant of petroleum products. VITOL, upon information and belief, owned the fuel and ultra hazardous and explosive products that were being unloaded from the M/T Cape Bruny into the Gulf Oil Facility on October 23, 2009, which burned or exploded.
- h. Intertek Group, plc ("Intertek"), a corporation with offices at 25 Saville Row, London W1S 2ES, England, U.K. Intertek, acting through its division, Intertek Oil Chemical & Agri Division (Caleb Brett), on or about October 20, 2009, entered into an agreement with Astra Oil and/or Astra Oil Trading and/or others, which required Intertek to plan, assess, supervise and oversee the discharge and delivery of product from the M/T Cape Bruny and all times referenced herein. Specifically, such agreement required Intertek to insure that the receiving tanks and equipment were in proper condition to receive the product from the M/T Cape Bruny and required Intertek to supervise the discharge of the fuel in accordance with certain requirements specified in the agreement, which Intertek failed to do or did negligently.
- i. RYTTSA is a foreign corporation or business entity that was acting as agents of Repsol Petroleo, S.A., Repsol, S.A. and/or the Repsol YPF Group Businesses unit in charge of the marketing, supply and transportation activities of Repsol Petroleo, S.A., Repsol, S.A. and/or Repsol YPF Group Businesses.

**JURISDICTION AND VENUE**

4.

This Court has jurisdiction over this action pursuant to 28 U.S.C. § 1333, made applicable by the Extension of Admiralty Jurisdiction Act, 46 U.S.C. § 30101, because of the maritime nature of some of the claims asserted herein (saving to Plaintiffs all other remedies to which they are otherwise entitled) and because the M/T Cape Bruny was engaged in maritime commerce at the time of the events that form the bases of this suit. This Court also has jurisdiction pursuant to 28 U.S.C. § 1332, because the matter in controversy exceeds the sum or value of 75,000.00, exclusive of interest and costs, and the Plaintiffs are citizens of Puerto Rico and the defendants are citizens of different states or subjects of foreign States. All the maritime claims are brought on the law side of the Court with a trial by jury.

5.

This Court has subject matter jurisdiction over the state law claims asserted herein pursuant to 28 U.S.C. § 1337 because such claims are so related to the claims within the Court's original jurisdiction that they form a part of the same case or controversy under Article III of the United States Constitution.

6.

Prosecution of this action in this district is proper under 28 U.S.C. §§ 1331 because all the events or omissions giving rise to the claims asserted herein occurred in this district and because at least four defendants may be found in this district and there

is no district in which the action may otherwise be brought.

7.

This Court's exercise of general jurisdiction is appropriate as to each of the defendants because they either have a principal place of business in Puerto Rico or have substantial or continuous and systematic contacts with Puerto Rico that approximate physical presence.

#### **FACTUAL ALLEGATIONS**

8.

On October 23, 2009, at approximately 12:30 a.m., an explosion occurred at the Gulf Oil Facility. Approximately twenty-one (21) storage tanks containing fuel, diesel, petroleum and other ultra hazardous and highly explosive products exploded, producing an enormous firewall, sonic boom and releasing toxic gases and substances into the air, water and soil. The blast was so powerful that it registered 2.8 in the Richter scale and was felt as far away as Culebra, Vieques, and even the Virgin Islands.

9.

The explosion occurred while the M/T Cape Bruny was unloading its cargo of 278,658 G.S.V. barrels (11,703,636 gallons) of highly flammable fuel (regular unleaded gasoline) at the marine dock/terminal. The M/T Cape Bruny pumped too much of its cargo (fuel) into the pipelines that connect the marine dock/terminal, thereby causing the recipient storage tanks (Nos. 107 and 409) to overflow without detection. As the cargo (fuel) spilled, it vaporized and spread across the Gulf Oil Facility. The vaporized fuel found a source of ignition, causing the explosion. The Gulf Oil Facility's

computerized monitoring system was not operational and a mechanical gauge attached to the storage tank could not be monitored by the two available Gulf Oil Facility employees involved in the operation. At the time of the explosion and while the transfer of the M/T Cape Bruny's cargo was being carried out, there were only five employees at the Gulf Oil Terminal: one security guard, two laboratory employees, and two more employees to perform all other required operations.

10.

VITOL was the supplier of the fuel that exploded. Astra Oil Limited was one of the receivers of the fuel, along with CPC and/or CPR. Astra Oil was acting as agent of Astra Oil Limited. On October 20, 2009 at 1:45 p.m., Elisa Fabian, an employee of Astra Oil sent an e-mail to Ramon Rodriguez, Irasema Grajales and Orlando Rosado, all employees of Intertek, and to William Koech, an employee of Antares, wherein Astra Oil Limited and VITOL requested "your services to supervise the discharge of the referenced vessel [the M/T Cape Bruny] in accordance with the following requirements: "..... Tanks are to be out of the critical zone. Please report status of each tank....." The e-mail further stated:

The following additional instructions concerning this operation are to be followed as general guidelines:

Mutual inspection companies must check and note the following situations:

Shore side

- Following a nomination the mutual inspection company should contact the terminal and obtain information concerning the condition and status of the nominated shore tanks and advise Astra and their representatives. This will allow time for the receivers to present the shore tank in a suitable condition for cargo receipt or work out a commercial

agreement with Astra before receipt of cargo.

\* \* \* \*

Shore line volume verification

- Careful monitoring ship to shore during this function.

\* \* \* \*

Key Meeting

- This is to incorporate any incidents load port and in-transit.
- Sight load port papers including tank calibrations and validity of same.
- Identify point of calibration. Unless specifically stated otherwise in vessel's calibration tables, pipeline volumes are including in cargo tank volumes.

Gauging equipment (ship to shore)

- Gauging equipment to be checked for accuracy prior to use.

Cargo tank gauging

- This to be performed to all witnessing personnel's satisfaction. Particular reference must be made to official gauge heights.

\* \* \* \*

Please confirm your acceptance to all of the above instructions and confirm your attendance.

Regards,  
Thanks and best regards,

Elisa Fabian  
Astra Oil Company LLC

\* \* \* \*

11.

On information and belief Antares was acting on behalf of VITOL and was one of

the “mutual inspection companies” required to inspect the tanks and supervise the discharge of the fuel.

12.

Twenty-seven minutes later, Orlando Rosado, on behalf of Intertek, responded to Elisa Fabian’s e-mail as follows: “We confirm the receipt of this nomination and will be following your instructions accordingly.”

13.

However, Intertek and Antares failed to perform the duties they were required to perform as the mutual inspection companies and did not properly perform the functions they were required to perform, or performed said functions negligently.

14.

The explosion and fire, which lasted four days, generated an enormous smoke plume full of hazardous contaminants to which thousands of residents, including Plaintiffs, were exposed causing them serious bodily harm.

15.

The blast also caused severe property damage to the homes, buildings and businesses owned by Plaintiffs in the affected areas. The force of explosion broke their windows, knocked doors off their hinges and frames and caused other severe damage. While the fire was burning, the homes, buildings and businesses had to be evacuated. Plaintiffs could not use their homes and buildings, and could not operate their businesses, resulting in loss of business income and opportunity.

16.

As a result of the explosion and fire, toxic gases and particulate were released

into the atmosphere and spread from the Gulf Oil Facility to several areas of San Juan and the adjacent communities and municipalities of Puente Blanco, Cucharillas, Villa Paraíso, Las Palmas, Las Vegas, Juana Matos, Cataño, Levittown, Toa Baja, Bayamón and others. Plaintiffs were exposed to the toxic gases and particulate, suffering injuries.

17.

The toxic gases and particulate have also caused serious and dangerous environmental contamination of water, water supplies and the land where the homes, buildings and businesses owned by Plaintiffs are located. The contamination has depreciated the value of the homes, buildings and businesses owned by Plaintiffs, or has made them unmarketable, thereby causing losses to Plaintiffs.

18.

As a result of the explosion, fire, exposure to toxic gases and particulate, and the contamination of water, water supply, land, homes, buildings and businesses, Plaintiffs have suffered fear, stress and anxiety.

19.

There are many other potential effects from the explosion that have not yet become known, and Plaintiffs reserve the right to amend this Complaint once additional information becomes available.

20.

The fire and explosion, and the resulting damages suffered by the Plaintiffs were caused by the concurrent actions, inactions and negligence of all the Defendants.

**FIRST CAUSE OF ACTION**  
**NEGLIGENCE OF OPERATORS AND OTHERS**  
**RESPONSIBLE FOR THE OPERATIONS OF THE GULF OIL FACILITY.**

21.

Plaintiffs repeat, reiterate, and reallege each and every allegation set forth above with the same force and effect as if copied herein.

22.

Intertek, Antares, Astra Oil and Astra Oil Limited had agreed to exercise control of the operations carried out at the Gulf Oil Facility and on the M/T Cape Bruny on October 23, 2009 for the discharge of the fuel.

23.

The explosion and resultant fire and toxic release was caused by the negligence and fault of Intertek, Antares, Astra Oil and Astra Oil Limited in the following non-exclusive particulars:

- a. Transferring or allowing the transfer of fuel and/or other explosive materials from the M/T Cape Bruny into a storage tank that could not be properly monitored because the Gulf Oil Facility's computerized monitoring system was not fully operational;
- b. Transferring or allowing the transfer of fuel and/or other explosive materials from the M/T Cape Bruny into storage tanks that were equipped only with mechanical gauges, which could not be monitored.
- c. Transferring or allowing the transfer of fuel and/or other explosive materials

from the M/T Cape Bruny while only two employees of the Gulf Oil Facility were available to perform the operation;

d. Allowing overflow of the storage tanks (Nos. 107 and 409) that were receiving fuel and/or other explosive materials from the M/T Cape Bruny;

e. Failing to coordinate with the crew of the M/T Cape Bruny the operation for the transfer of fuel and/or other explosive materials that was underway when the explosion occurred;

f. Failing to properly operate the Gulf Oil Facility and to monitor the fuel-transfer or fuel-discharge operations so as to prevent the explosion, fire and toxic release and failing to prevent actions that either caused or contributed to the explosion, fire and toxic release;

g. Operating the Gulf Oil Facility in such a manner that allowed actions that caused the explosion, fire and toxic release, including failing to have a operational monitoring system in place and not having enough personnel or equipment to close the valves of the recipient tanks so as to prevent the overflow of the fuel;

h. Failing to properly inspect the Gulf Oil Facility to assure that the tanks, equipment and personnel were fit for their intended purpose;

i. Acting in a careless and negligent manner without due regard for the safety of others;

j. Failing to follow and enforce rules and regulations pertaining to the safe operations of the Gulf Oil Facility at the time of the explosion, fire and toxic release, which, if they had been so promulgated, implemented and enforced, would have averted said explosion, fire and toxic release;

- k. Operating the Gulf Oil Facility with untrained and unlicensed personnel;
- l. Inadequate and negligent training and hiring;
- m. Failing to take appropriate action to avoid or mitigate the explosion, fire and toxic release;
- n. Negligent implementation of policies and procedures for the safe transfer and storage of fuel and/or other explosive materials and failing to follow standards and regulations for the safe transfer and storage of fuel and/or other explosive materials;
- o. Employing untrained or poorly trained employees and failing to properly train employees;
- p. Failing to ascertain that the tanks and equipment were free from defects and/or in proper working order;
- q. Failure to timely warn;
- r. Failure to timely bring the release of fuel and/or other explosive materials under control;
- s. Failure to provide appropriate accident prevention equipment;
- t. Failure to observe and read the gauges of the tank that was receiving fuel and/or other explosive materials;
- u. Failure to react properly to danger signs;
- v. Failure to have adequate water supply and other emergency systems to stop and/or control the explosion and fire;

- w. Failure to follow and comply with standards, rules, regulations and statutes, including those set out in and incorporated by reference into the Code of Federal Regulations, which are designed to prevent the type of explosion, fire and toxic release that occurred at the Gulf Oil Facility;
- x. Failing to take manual measurements or soundings to determine the amount of fuel that was inside the receiving tanks;
- y. Failing to perform those acts listed in the e-mail dated October 20, 2009 from Elisa Fabian to Intertek's and Antares' representatives; and
- z. Such other acts of negligence and omissions as will be shown at the trial of this matter, all of which acts are in violation of the laws of Puerto Rico and the United States of America.

**SECOND CAUSE OF ACTION**  
**LIABILITY FOR THINGS UNDER ONE'S CONTROL**

24.

Plaintiffs repeat, reiterate, and reallege each and every allegation set forth above with the same force and effect as if copied herein.

25.

The explosion, fire and resultant toxic release was caused by improper, unsafe and negligent acts or omissions in preparation and during the course of offloading said fuel, and which was in the care, custody, and control of Astra Oil, Astra Oil Limited, Intertek and Antares over which Astra Oil, Astra Oil Limited, Intertek and Antares had *garde*. Astra Oil, Astra Oil Limited, Intertek and Antares knew or should have known that these acts and omissions were dangerous and posed an unreasonable risk of harm, including, but not limited to the risk of release of fuel and explosion.

**THIRD CAUSE OF ACTION**  
**LIABILITY OF PARTIES RESPONSIBLE FOR**  
**TRANSPORTATION AND DELIVERY OF DANGEROUS CARGO**

26.

Plaintiffs repeat, reiterate, and reallege each and every allegation set forth above with the same force and effect as if copied herein.

27.

Repsol and VITOL were in the process of transporting and delivering a highly flammable cargo when the explosion occurred. Repsol and VITOL were negligent and otherwise at fault for the following non-exclusive particulars:

- a. Failing to take appropriate and reasonable measures to ensure the safe offloading of the flammable cargo it carried;
- b. Failing to have appropriate trained personnel in charge of the transfer operations and failing to monitor the fuel-transfer or fuel-discharge operations so as to prevent the explosion.
- c. Failing to have an appropriate monitoring system to track the highly volatile cargo it was carrying and offloading;
- d. Failing to have an appropriate warning system to alert persons at risk of leaks as well as the risks of fire and explosions;
- e. Pumping too much flammable fuel from the M/T Cape Bruny to the receiving storage tanks;
- f. Failing to coordinate with personnel at the Gulf Oil Facility to insure that the receiving tanks did not overflow;
- g. Transferring or allowing the transfer of fuel and/or other explosive

materials from the M/T Cape Bruny into storage tanks that could not be properly monitored because the Gulf Oil Facility's computerized monitoring system was not fully operational;

- h. Transferring or allowing the transfer of fuel and/or other explosive materials from the M/T Cape Bruny into storage tanks that were equipped only with mechanical gauges, which could not be monitored;
- i. Transferring or allowing the transfer of fuel and/or other explosive materials from the M/T Cape Bruny while only two employees of the Gulf Oil Facility were available to perform the operation;
- j. Allowing overflow of the storage tanks that were receiving fuel and/or other explosive materials from the M/T Cape Bruny;
- k. Failing to coordinate between the Gulf Oil Facility employees and the crew of the M/T Cape Bruny the operation for the transfer of fuel and/or other explosive materials that was underway when the explosion occurred;
- l. Failing to properly operate the M/T Cape Bruny so as to prevent the explosion, fire and toxic release and failing to prevent actions that either caused or contributed to the explosion, fire and toxic release;
- m. Operating the M/T Cape Bruny in such a manner that allowed actions that caused the explosion, fire and toxic release, including failing to have a operational monitoring system in place;
- n. Failing to properly inspect the Gulf Oil Facility to assure that the tanks, equipment and personnel were fit to receive the cargo from the M/T Cape Bruny;

- o. Acting in a careless and negligent manner without due regard for the safety of others;
- p. Failing to promulgate, implement and enforce rules and regulations pertaining to safe transfer operations at the time of the explosion, fire and toxic release, which, if they had been so promulgated, implemented and enforced, would have averted said explosion, fire and toxic release;
- q. Operating the M/T Cape Bruny with untrained and unlicensed personnel;
- r. Inadequate and negligent training and hiring of Antares and Intertek, two companies that failed to perform their duties properly;
- s. Failing to take appropriate action to avoid or mitigate the explosion, fire and toxic release;
- t. Negligent implementation of policies and procedures for the safe transfer and storage of fuel and/or other explosive materials and failing to follow standards and regulations for the safe transfer and storage of fuel and/or other explosive materials;
- u. Employing untrained or poorly trained employees and failing to properly train employees;
- v. Failing to ascertain that the receiving storage tanks and equipment were free from defects and/or in proper working order;
- w. Failure to timely warn;
- x. Failure to timely bring the release of fuel and/or other explosive materials under control;
- y. Failure to provide appropriate accident prevention equipment;

- z. Failure to observe and read the gauges of the tank that was receiving fuel and/or other explosive materials and failing to take manual measurements or sounding to determine the amount of fuel that was inside the receiving tanks;
- aa. Failure to react properly to danger signs;
- bb. Failure to follow and comply with standards, rules, regulations and statutes, including those set out in and incorporated by reference into the Code of Federal Regulations, which regulate the transfer of a dangerous cargo and are designed to prevent the type of explosion, fire and toxic release that occurred at the Gulf Oil Facility;
- cc. Failing to perform those acts listed in the e-mail dated October 20, 2009 from Elisa Fabian to Intertek's and Antares' representatives; and
- dd. Such other acts of negligence and omissions as will be shown at the trial of this matter, all of which acts are in violation of the laws of Puerto Rico and the United States of America.

28.

The explosion, fire and toxic release that resulted from the negligent offloading of the M/T Cape Bruny substantially impacted commercial maritime activity in and around Bayamón and San Juan, Puerto Rico. The offloading of the flammable cargo from the M/T Cape Bruny in navigable waters bore a substantial relationship to traditional maritime activity.

29.

Because the injuries suffered by Plaintiffs were caused, at least in part, by a vessel operating in navigable waters, while in the process of conducting a maritime operation, the maritime claims asserted herein are subject to the Court's admiralty jurisdiction. 46 U.S.C. § 30101; *Grubart v. Great Lakes Dredge & Dock Co.*, 513 U.S. 527 (1995).

**FOURTH CAUSE OF ACTION**  
**NEGLIGENT ENTRUSTMENT OF FLAMABLE MATERIALS**

30.

Plaintiffs repeat, reiterate, and reallege each and every allegation set forth above with the same force and effect as if copied herein.

31.

Chevron, VITOL, RYTTSA, Astra Oil and Astra Oil Trading all owned or had control over all or some of the fuel and ultra hazardous and explosive products that were stored, or that were in the process of being stored at the Gulf Oil Facility, or that were being unloaded from the M/T Cape Bruny at the Gulf Oil Facility on October 23, 2009, which burned or exploded.

32.

Chevron, VITOL, RYTTSA, Astra Oil and Astra Oil Trading either knew, or should have known that (1) the Gulf Oil Facility did not have the proper or adequate equipment or personnel to safely store fuel or other ultra hazardous or explosive materials; and (2) that the Gulf Oil Facility is located in the middle of communities where Plaintiffs live. Despite this knowledge, and in complete disregard of the safety of Plaintiffs, they

elected to store their fuel and ultra hazardous and explosive materials at the Gulf Oil Facility, some of which was being unloaded from the M/T Cape Bruny when the explosion occurred. By these actions put at risk the Plaintiffs, as well as their homes, property, buildings and businesses.

33.

The injuries suffered by Plaintiffs are the direct result of Chevron, VITOL, RYTTSA, Astra Oil and Astra Oil Trading having negligently entrusted their fuel and ultra hazardous and explosive products to the Gulf Oil Facility.

**FIFTH CAUSE OF ACTION**  
**TRESPASS BY ALL DEFENDANTS**

34.

Plaintiffs repeat, reiterate, and reallege each and every allegation set forth above with the same force and effect as if copied herein.

35.

Defendants' negligent acts and omissions have resulted and continue to result in the direct and physical invasion of Plaintiffs' persons and properties, by the toxic and/or harmful substances that have contaminated their persons, properties, buildings, businesses and the surrounding surface and subsurface areas.

36.

As a direct and proximate result of the acts and omissions of Defendants, Plaintiffs have suffered losses in the form of, but not limited to, personal injury, emotional distress, loss of income, the creation of conditions harmful to human health and the environment, and loss of the beneficial use, enjoyment, and exclusive possession of their property, for which they are entitled to be compensated.

**SIXTH CAUSE OF ACTION**  
**NUISANCE CREATED BY ALL DEFENDANTS**

37.

Plaintiffs repeat, reiterate, and reallege each and every allegation set forth above with the same force and effect as if copied herein.

38.

Defendants' acts and omissions with respect to the explosions, fire and release of toxic and/or harmful substances have caused and continue to cause a material, substantial and unreasonable interference with Plaintiffs' use and enjoyment of their homes, buildings, properties and businesses, and have materially diminished and continue to diminish the value thereof.

39.

Defendants' material, substantial, and unreasonable interference with the use and enjoyment of Plaintiffs' homes, buildings, properties and businesses, and the continuing material, substantial and unreasonable interference with such use and enjoyment constitute a continuing private nuisance.

40.

Defendants' creation and continuing creation of private nuisance proximately caused and continues to proximately cause damage to Plaintiffs in the form of personal injury, emotional distress and property damage.

41.

As a direct and proximate result of the acts and omissions of Defendants, Plaintiffs have suffered losses in the form of, but not limited to, personal injury,

emotional distress, loss of income, the creation of conditions that are harmful to human health and the environment, and loss of the beneficial use, enjoyment and exclusive possession of their homes, buildings, properties and businesses, for which they are entitled to be compensated.

**SEVENTH CAUSE OF ACTION**  
**FAILURE BY ALL DEFENDANTS TO PROPERLY RESPOND TO EMERGENCY**

42.

Plaintiffs repeat, reiterate, and reallege each and every allegation set forth above with the same force and effect as if copied herein.

43.

The injuries to Plaintiffs were also caused by or aggravated by the fact that Defendants failed to properly respond to the explosion, fire and subsequent toxic release and take necessary actions to mitigate the danger to the surrounding community and/or to timely and adequately warn of the toxic release.

44.

Furthermore, Defendants failed to have adequate water supply and other fire-fighting systems required by the nature of their hazardous operations, which would have prevented the spread of the original explosion and fire and would have minimized the damages caused thereby.

**EIGHTH CAUSE OF ACTION**  
**RES IPSA LOQUITOUR**

45.

Plaintiffs repeat, reiterate, and reallege each and every allegation set forth above with the same force and effect as if copied herein.

46.

In addition to the negligent actions described above, and in the alternative thereto, the injuries and damages suffered by Plaintiffs were caused by the acts and/or omissions of the Defendants that are beyond proof by the Plaintiffs, but which were within the knowledge and control of the Defendants, there being no other possible conclusion than the explosion, fire and toxic release resulted from the negligence of Defendants. Furthermore, the explosion, fire and resultant toxic release would not have occurred had the Defendants exercised the high degree of care imposed on them by the nature of their cargo and unloading operations and by rules, regulations and statutes, including those set out in the Code of Federal Regulations, that control hazardous operations such as theirs, and Plaintiffs, therefore, plead the doctrine of *res ipsa loquitur*.

**NINTH CAUSE OF ACTION**  
**LIABILITY UNDER P.R. CIVIL CODE ARTICLE 1802**

47.

Plaintiffs repeat, reiterate, and reallege each and every allegation set forth above with the same force and effect as if copied herein.

48.

“A person who by an act or omission causes damage to another through fault or negligence shall be obliged to repair the damage so done.” Puerto Rico Civil Code Article 1802.

Defendants, through their negligent acts and omissions described above, caused the damage suffered by Plaintiffs.

**TENTH CAUSE OF ACTION**  
**26 L.P.R.A. § 2001**

49.

Plaintiffs repeat, reiterate, and reallege each and every allegation set forth above with the same force and effect as if copied herein.

50.

MAPFRE is an insurer that issued insurance policies to one or more of the defendants named herein against loss or damage or for legal liability for the bodily injury, death, or damage to property of a third person; and said policies of insurance were in effect at the time of the explosion and damages described above suffered by Plaintiffs.

51.

Pursuant to 26 L.P.R.A. § 2001, MAPFRE, having issued policies insuring one or more of the defendants named herein, is absolutely liable directly to Plaintiffs for the losses suffered by them and covered by said policies, and payment of such losses by MAPFRE directly to the Plaintiffs is required by said statute.

52.

MAPFRE is liable to the Plaintiffs for losses and damages caused by the acts, omissions and/or liability of each insured defendant.

**DAMAGES**

53.

As a result of the explosion and fire, and the exposure to the toxic release caused by the Defendants, Plaintiffs suffered serious personal injuries. Plaintiffs further fear that, as a result of their exposure, they will suffer continuing adverse health consequences and/or disabling diseases in the future and pray for medical monitoring ordered by the Court.

54.

All of the above have caused considerable fear, anguish, discomfort, and inconvenience to Plaintiffs, as well as pain and suffering, mental anguish, emotional distress, and psychiatric and psychological damages.

55.

Plaintiffs have also suffered losses from their inability to use and enjoy the use of their homes, buildings, property and businesses, and from their contamination, which have reduced their value.

56.

Plaintiffs are entitled to a judgment finding Defendants liable to Plaintiffs for all the damages suffered as a result of Defendants' negligence and awarding Plaintiffs adequate compensation therefore in amounts determined by the trier of fact.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiffs demand judgment against Defendants, jointly, severally and *in solido*, for the following:

- a. Physical injuries, emotional distress and pain & suffering compensatory damages in amounts to be determined at trial, but not less than \$500,000,000.00

- b. Economic, property and compensatory damages in amounts to be determined at trial;
- c. Punitive damages, which are available under maritime law;
- d. Pre-judgment and post-judgment interest at the maximum rate allowable by law; and
- e. All other remedies available by law and a trial by jury.

RESPECTFULLY SUBMITTED,

In San Juan, Puerto Rico, this 23<sup>rd</sup> day of February, 2011.

*s/ John F. Nevares*  
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